

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)



Order Filed on February 16, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

In Re:
LTL Management LLC

Case No.: 21-30589

Adv. No.:

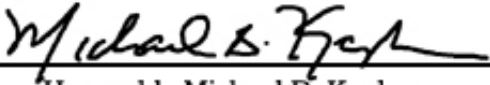
Hearing Date:

Judge: Michael B. Kaplan

**JOINT STIPULATION AND AGREED ORDER BETWEEN MOVANTS AND DEBTOR
REGARDING THE ADMISSION OF EXHIBITS AT MOTION TO DISMISS TRIAL**

The relief set forth on the following page is hereby **ORDERED**.

DATED: February 16, 2022


Honorable Michael B. Kaplan
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>COOLEY LLP Cullen D. Speckhart (admitted pro hac vice) Michael Klein (admitted pro hac vice) Erica J. Richards (pro hac vice to be filed) Lauren A. Reichardt (pro hac vice to be filed) Evan Lazerowitz 55 Hudson Yards New York, NY 10001 Tel: (212) 479-6000 Fax: (212) 479-6275 Email: cspeckhart@cooley.com mklein@cooley.com erichards@cooley.com lreichardt@cooley.com elazerowitz@cooley.com</p> <p><i>Proposed Co-Counsel to the Official Committee of Talc Claimants II</i></p>	<p>BAILEY GLASSER LLP Brian A. Glasser, Esq. (admitted pro hac vice) Thomas B. Bennett, Esq. (admitted pro hac vice) Kevin W. Barrett, Esq. (admitted pro hac vice) Maggie B. Burrus, Esq. (admitted pro hac vice) 105 Thomas Jefferson St. NW, Suite 540 Washington, DC 20007 Tel: (202) 463-2101 Fax: (202) 463-2103 Email: bglasser@baileyglasser.com tbennett@baileyglasser.com</p> <p><i>Proposed Co-Counsel to the Official Committee of Talc Claimants II</i></p>
<p>WALDREP WALL BABCOCK & BAILEY PLLC Thomas W. Waldrep, Jr. (admitted pro hac vice) Kevin L. Sink (admitted pro hac vice) James C. Lanik (admitted pro hac vice) Jennifer B. Lyday (admitted pro hac vice) 370 Knollwood Street, Suite 600 Winston-Salem, NC 27103 Tel: (336) 717-1280 Fax: (336) 717-1340 Email: notice@waldrepwall.com</p> <p><i>Proposed Co-Counsel to the Official Committee of Talc Claimants II</i></p>	<p>MASSEY & GAIL LLP Jonathan S. Massey, Esq. (admitted pro hac vice) 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 Email: jmassey@masseygail.com</p> <p><i>Proposed Co-Counsel to the Official Committee of Talc Claimants II</i></p>
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In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Honorable Michael B. Kaplan

**JOINT STIPULATION AND AGREED ORDER BETWEEN MOVANTS AND
DEBTOR REGARDING THE ADMISSION OF EXHIBITS
AT MOTION TO DISMISS TRIAL**

The relief set forth on the following pages is hereby **ORDERED**.

This stipulation and agreed order (this “Stipulation”) is made on this 16th day of February, 2022 (the “Stipulation Date”) by the Official Committee of Talc Claimants I (the “TCC I”), the Official Committee of Talc Claimants II (the “TCC II”), Aylstock, Witkin, Kreis & Overholtz, PLLC (“AWKO”), and Arnold & Itkin LLP on behalf of certain personal injury tort plaintiffs (collectively, “Movants”), and LTL Management LLC, the debtor and debtor-in-possession (“Debtor”), regarding the evidentiary record for the Motion of the Official Committee of Talc Claimants to Dismiss Debtor’s Chapter 11 Case [Docket No. 632] and Motion to Dismiss Bankruptcy Case filed by Arnold & Itkin LLP on behalf of certain personal injury tort plaintiffs [Docket No. 766] (the “Motions to Dismiss”).

Recitals

WHEREAS, Debtor served an Amended Preliminary Hearing Exhibit List on Movants on or about February 12, 2022 and transmitted it to the Court electronically on February 13, 2022, annexed as Exhibit A hereto (“Debtor’s List”);

WHEREAS, Movants served an Amended Preliminary Hearing Exhibit List on Debtor and transmitted it to the Court electronically on or about February 13, 2022, annexed as Exhibit B hereto (“Movants’ List”);

WHEREAS, the Preliminary Hearing on the Motions to Dismiss commenced on February 14, 2022 (the “MTD Trial”);

WHEREAS, Movants and Debtor wish to avoid hearing testimony solely for the purpose of authenticating documents and to streamline the presentation of evidence at the MTD Trial in the interests of judicial economy and efficiency;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. Debtor has objected to certain exhibits on Movants' List, and Movant has represented (a) that some of these exhibits will be offered for a non-hearsay purpose; (b) that others will not be offered into evidence or will be used for impeachment only; or (c) has otherwise addressed Debtor's objections, as reflected in the chart below:

Ex. No.	Category	Objection	Outcome
3	Demonstrative Exhibits	Hearsay, Authenticity	Not For The Truth
7	Demonstrative Exhibits	Hearsay, Authenticity	Not For The Truth
13	News Articles	Hearsay, Relevance	Not For The Truth
25	Congressional Materials	Hearsay, Relevance	Not For The Truth
28	Motion to Dismiss	Hearsay	Not For The Truth
41	Privilege Log	Relevance	Impeachment Only
52	Demonstrative Exhibits	Hearsay, Authenticity	Not For The Truth
68	Confidential Document	Confidentiality	To Be Addressed When Exhibit Is Discussed
100	News Articles	Hearsay, Relevance	Not For The Truth
128	Demonstrative Exhibits	Hearsay, Authenticity	Not For The Truth
140	Congressional Materials	Hearsay, Relevance	Not For The Truth
150	Confidential Document	Confidentiality	To Be Addressed When Exhibit Is Discussed
161	Confidential Document	Confidentiality	Motion to Seal Overruled By The Court On February 14, 2022
331	News Articles	Hearsay, Relevance	Not For The Truth
357	Lisman Depo Excerpt	Hearsay, FRCP 32	Not For The Truth
515	News Articles	Hearsay, Relevance	Not For The Truth
547	Clawed-Back Document	Privilege	Withdrawn by Movants
585	News Articles	Hearsay, Relevance	Not For The Truth

2. Movants' Exhibits 501.01-503.29 represent documents that were annexed to or relied upon by Movants' expert witnesses. Movants agree to withdraw these exhibits.

3. Movants' Exhibits 600.009-014, 600.030, 600.36-041, 600.60, 600.63, and 600.74 are the subject of the Debtor's Motion to Seal, Adv. Proc. No. 21-3032, Dkt. No. 134, which the Court granted orally on February 14, 2022. Those documents shall remain under seal pursuant to the Court's ruling. In addition, Movants have marked SPGI0001149_0001 and SPGI0001150_0001 as Movants' Exhibits 746 and 747. Debtor does not object to these exhibits, and they are admitted into evidence.

4. All the exhibits on Movants' List, except for those withdrawn or limited as noted in paragraph 1, 2, and 3 above, are admitted into evidence and shall be considered part of the record for the MTD Trial, and the Court may consider such evidence in connection with the Motions to Dismiss.

5. Movants have objected to certain exhibits on Debtor's List, and Debtor has represented: (a) that some of these exhibits will be offered for a non-hearsay purpose; (b) that others will not be offered into evidence or will be used for impeachment only; or (c) has otherwise addressed Movants' objections, as reflected in the chart below:

Ex. No.	Category	Objection	Outcome
9	Articles by Third Party	Hearsay	Impeachment Only; Not For The Truth
11	Articles by Third Party	Hearsay	Impeachment Only; Not For The Truth
17	Debtor's Briefs	Hearsay	Not for the Truth
42	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor;
43	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
45	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
46	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
47	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor

Ex. No.	Category	Objection	Outcome
48	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
49	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
50	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
51	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
52	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
53	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
54	Expert Reliance Materials	Hearsay, Authenticity	Exhibit Withdrawn By Debtor
66	Articles by Third Party	Hearsay	Impeachment Only; Not For The Truth
79	Articles by Third Party	Hearsay	Impeachment Only; Not For The Truth
80	Articles by Third Party	Hearsay	Impeachment Only; Not For The Truth
81	Materials Relating to Other Proceedings	Hearsay	Impeachment Only; Not For The Truth
82	Materials Relating to Other Proceedings	Hearsay	Impeachment Only; Not For The Truth
84	Materials Relating to Other Proceedings	Hearsay	Impeachment Only; Not For The Truth
85	Materials Relating to Other Proceedings	Hearsay	Impeachment Only; Not For The Truth
87	Articles by Third Party	Hearsay	Exhibit Withdrawn By Debtor
90	Debtor's Briefs	Hearsay	Not for the Truth
92	Debtor's Briefs	Hearsay	Not for the Truth
93	Transcripts From Other Matters	Hearsay	Exhibit Withdrawn By Debtor
94	Transcripts From Other Matters	Hearsay	Exhibit Withdrawn By Debtor
95	Transcripts From Other Matters	Hearsay	Exhibit Withdrawn By Debtor
96	Transcripts From Other Matters	Hearsay	Exhibit Withdrawn By Debtor
97	Transcripts From Other Matters	Hearsay	Exhibit Withdrawn By Debtor
105	Transcript of Mr. Mongon's Deposition	Hearsay, FRCP 32	Impeachment Only; Not For The Truth

6. Debtor has marked JNJTALC001446066 and JNJTALC001518374 as Debtor's Exhibits 112 and 113, respectively. Movants do not object to these exhibits, and they are admitted into evidence.

7. All exhibits on Debtor's List, other than those withdrawn or limited as noted in paragraph 5 above, are admitted into evidence and shall be considered part of the record for the MTD Trial, and the Court may consider such evidence in connection with the Motions to Dismiss.

8. Movants and Debtor will meet-and-confer about any other exhibits they may wish to introduce into evidence.

9. This Stipulation shall constitute the entire agreement and understanding between Movants and Debtor relating to the subject matter hereof and supersedes all prior agreements and understandings between Movants and Debtor relating to the subject matter hereof.

10. The Court shall retain jurisdiction to resolve any disputes, controversies, or ambiguities arising from this Stipulation.

AGREED AS TO FORM AND SUBSTANCE:

**SHERMAN, SILVERSTEIN,
KOHL, ROSE & PODOLSKY, P.A.**
*Proposed Local Counsel to the
Official Committee of Talc Claimants II*

GENOVA BURNS, LLC
*Proposed Local Counsel to the
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Dated: February 16, 2022

Dated: February 16, 2022

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Dated: February 16, 2022

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Dated: February 16, 2022

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Dated: February 16, 2022

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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(Admitted *pro hac vice*)
ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 21-30589 (MBK)

Judge: Michael B. Kaplan

DEBTOR'S AMENDED EXHIBIT LIST

LTL Management LLC identifies below the exhibits it intends to use at the hearing on (i) the Motion of the Official Committee of Talc Claimants to Dismiss Debtor's Chapter 11 Case [Dkt. No. 632] and (ii) the Motion to Dismiss Bankruptcy Case filed by A&I [Dkt. No. 766].

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Ex.	Description	Beg. Bates No.	Confidential ² Designation
1.	Exhibit 1 contains the 2021 Corporate Restructuring closing binder, which includes eighty individual documents. For ease of reference, the Debtor provides the following chart to identify each document in the closing binder by Bates number.	LTL 0001058-LTL 0003086	
	Ex. 1.1	LTL 0001058	LTL 0001061
	Ex. 1.2	LTL 0001062	LTL 0001074
	Ex. 1.3	LTL 0001075	LTL 0001076
	Ex. 1.4	LTL 0001077	LTL 0001078
	Ex. 1.5	LTL 0001079	LTL 0001091
	Ex. 1.6	LTL 0001092	LTL 0001111
	Ex. 1.7	LTL 0001112	LTL 0001113
	Ex. 1.8	LTL 0001114	LTL 0001115
	Ex. 1.9	LTL 0001116	LTL 0001119
	Ex. 1.10	LTL 0001120	LTL 0001134
	Ex. 1.11	LTL 0001135	LTL 0001144
	Ex. 1.12	LTL 0001145	LTL 0001146
	Ex. 1.13	LTL 0001147	LTL 0001150
	Ex. 1.14	LTL 0001151	LTL 0001158
	Ex. 1.15	LTL 0001159	LTL 0001176
	Ex. 1.16	LTL 0001177	LTL 0001191
	Ex. 1.17	LTL 0001192	LTL 0001204
	Ex. 1.18	LTL 0001205	LTL 0001221
	Ex. 1.19	LTL 0001222	LTL 0001234
	Ex. 1.20	LTL 0001235	LTL 0001254
	Ex. 1.21	LTL 0001255	LTL 0001266
	Ex. 1.22	LTL 0001267	LTL 0001302
	Ex. 1.23	LTL 0001303	LTL 0001326
	Ex. 1.24	LTL 0001327	LTL 0001390
	Ex. 1.25	LTL 0001391	LTL 0001817
	Ex. 1.26	LTL 0001818	LTL 0001828
	Ex. 1.27	LTL 0001829	LTL 0001831
	Ex. 1.28	LTL 0001832	LTL 0001846
	Ex. 1.29	LTL 0001847	LTL 0001849
	Ex. 1.30	LTL 0001850	LTL 0001866
	Ex. 1.31	LTL 0001867	LTL 0001873
	Ex. 1.32	LTL 0001874	LTL 0001889
	Ex. 1.33	LTL 0001890	LTL 0001900

² The Debtor's listing of an exhibit does not waive the Debtor's confidentiality designation for any exhibit previously so marked.

Ex.	Description			Beg. Bates No.	Confidential ² Designation
	Ex. 1.34	LTL 0001901	LTL 0001969		
	Ex. 1.35	LTL 0001970	LTL 0002036		
	Ex. 1.36	LTL 0002037	LTL 0002056		
	Ex. 1.37	LTL 0002057	LTL 0002098		
	Ex. 1.38	LTL 0002099	LTL 0002117		
	Ex. 1.39	LTL 0002118	LTL 0002131		
	Ex. 1.40	LTL 0002132	LTL 0002162		
	Ex. 1.41	LTL 0002163	LTL 0002173		
	Ex. 1.42	LTL 0002174	LTL 0002181		
	Ex. 1.43	LTL 0002182	LTL 0002185		
	Ex. 1.44	LTL 0002186	LTL 0002201		
	Ex. 1.45	LTL 0002202	LTL 0002215		
	Ex. 1.46	LTL 0002216	LTL 0002231		
	Ex. 1.47	LTL 0002232	LTL 0002245		
	Ex. 1.48	LTL 0002246	LTL 0002274		
	Ex. 1.49	LTL 0002275	LTL 0002278		
	Ex. 1.50	LTL 0002279	LTL 0002282		
	Ex. 1.51	LTL 0002283	LTL 0002299		
	Ex. 1.52	LTL 0002300	LTL 0002320		
	Ex. 1.53	LTL 0002321	LTL 0002327		
	Ex. 1.54	LTL 0002328	LTL 0002343		
	Ex. 1.55	LTL 0002344	LTL 0002357		
	Ex. 1.56	LTL 0002358	LTL 0002368		
	Ex. 1.57	LTL 0002369	LTL 0002380		
	Ex. 1.58	LTL 0002381	LTL 0002413		
	Ex. 1.59	LTL 0002414	LTL 0002445		
	Ex. 1.60	LTL 0002446	LTL 0002465		
	Ex. 1.61	LTL 0002466	LTL 0002476		
	Ex. 1.62	LTL 0002477	LTL 0002482		
	Ex. 1.63	LTL 0002483	LTL 0002486		
	Ex. 1.64	LTL 0002487	LTL 0002491		
	Ex. 1.65	LTL 0002492	LTL 0002508		
	Ex. 1.66	LTL 0002509	LTL 0002540		
	Ex. 1.67	LTL 0002541	LTL 0002571		
	Ex. 1.68	LTL 0002572	LTL 0002602		
	Ex. 1.69	LTL 0002603	LTL 0002631		
	Ex. 1.70	LTL 0002632	LTL 0002646		
	Ex. 1.71	LTL 0002647	LTL 0002662		
	Ex. 1.72	LTL 0002663	LTL 0002670		
	Ex. 1.73	LTL 0002671	LTL 0002687		
	Ex. 1.74	LTL 0002688	LTL 0002772		
	Ex. 1.75	LTL 0002773	LTL 0002791		
	Ex. 1.76	LTL 0002792	LTL 0002978		

Ex.	Description			Beg. Bates No.	Confidential ² Designation
	Ex. 1.77	LTL 0002979	LTL 0003012		
	Ex. 1.78	LTL 0003013	LTL 0003047		
	Ex. 1.79	LTL 0003048	LTL 0003066		
	Ex. 1.80	LTL 0003067	LTL 0003086		
2.	<i>In re LTL Management. LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Expert Report of Gregory K. Bell, Ph.D., offered January 28, 2022 				Confidential
3.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Expert Report of John R. Castellano, offered January 28, 2022 				Confidential
4.	<i>In re LTL Management LLC</i> , No. 21-30589 (JCW), in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> Expert Report of Charles H. Mullin, Ph.D., offered October 29, 2021 				
5.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Debtor's Responses and Objections to First Set of Interrogatories by the Official Committee of Talc Claimants in Connection with Motion to Dismiss, dated December 31, 2021 Verification of John K. Kim in Support of Debtor's Answers and Objections to First Set of Interrogatories of Official Committee of Talc Claimants, dated December 31, 2021 				
6.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Debtor's Responses and Objections to First Set of Interrogatories by Arnold & Itkin LLP in Connection with Motion to Dismiss, dated December 31, 2021 Verification of John K. Kim in Support of Debtor's Answers and Objections to First Set of Interrogatories of Arnold & Itkin, dated December 31, 2021 				

Ex.	Description	Beg. Bates No.	Confidential ² Designation
7.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Debtor's Amended Responses and Objections to Second Set of Interrogatories by Arnold & Itkin LLP in Connection with Motion to Dismiss, dated January 27, 2022 Verification of John K. Kim in Support of Debtor's Amended Answers and Objections to Second Set of Interrogatories of Arnold & Itkin, dated January 27, 2022 		
8.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> January 19, 2022 Hearing Transcript 		
9.	October 14, 2021 American Association for Justice Statement on Johnson & Johnson's Declaration of Bankruptcy to Avoid Accountability for Dangerous Baby Powder		
10.	<i>In re LTL Management LLC</i> , No 21-30589, in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> Limited Omnibus Objection of the MDL Plaintiffs' Steering Committee to the Debtor's First Day Motions, filed October 19, 2021 		
11.	Beasley Allen article, "Ovarian Cancer Victims Vow Fight to Stop J&J's Bankruptcy Scheme"		
12.	<i>In re LTL Management LLC</i> , No. 21-30589, in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> October 20, 2021 First Day Hearing Transcript 		
13.	<i>In re LTL Management LLC</i> , No. 21-30589, in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> November 4, 2021 Hearing Transcript 		
14.	<i>In re LTL Management LLC</i> , No. 21-30589, in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> November 5, 2021 Hearing Transcript 		
15.	Johnson & Johnson Reconciliation of Non-GAAP Financial Measures, Fourth Quarter 2020		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
16.	Johnson & Johnson Reconciliation of Non-GAAP Financial Measures, Fourth Quarter 2021		
17.	<i>In re LTL Management LLC</i> , No. 21-30589, in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> • Informational Brief of LTL Management LLC 	LTL 0030038	
18.	Minutes of the October 14, 2021 Meeting of the Board of Managers of LTL Management LLC	LTL 0019184	
19.	Exhibit 14 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK)	JNJ 000518810	
20.	Exhibit 15 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK)	JNJTALC000851887	
21.	October 20, 2017 email to numerous individuals including Robert Wuesthoff with the subject line, “California Talc Verdict reversed”	JNJTALC001020384	
22.	Exhibit 17 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK)	JNJTALC001268780, JNJTALC001268782	
23.	Exhibit 20 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK)	JNJTALC001331402	
24.	<i>Ingham v. Johnson & Johnson</i> , 608 S.W.3d 663 (Mo. Ct. App. 2020), <i>reh'g and/or transfer denied</i> (July 28, 2020), <i>transfer denied</i> (Nov. 3, 2020), <i>cert. denied</i> , 141 S. Ct. 2716 (2021)		
25.	<i>Johnson & Johnson v. Ingham</i> , 141 S. Ct. 2716 (2021)		
26.	<i>In re LTL Management LLC</i> , No. 21-30589 (JCW), in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> • Exhibit 62, entitled, “Johnson & Johnson Consumer Inc. Talc 2021 Accounting Entry Sample – Confidential” 	LTL 0019833	
27.	Item 65 to Exhibit B of the Bell Expert Report, entitled “Johnson & Johnson Consumer Inc. balance sheet ending December 2017 (excluding branch income)”	LTL 0031551	Confidential
28.	Item 66 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc.	LTL 0031555	Confidential

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	balance sheet ending December 2018 (excluding branch income)”		
29.	Item 67 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc. balance sheet ending December 2019 (excluding branch income)”	LTL 0024246	
30.	Item 68 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc. balance sheet ending December 2020 (excluding branch income)”	LTL 0024250	
31.	Item 69 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc. balance sheet ending September 2021 (excluding branch income)”	LTL 0024253	
32.	Item 70 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc. income statement for twelve months ended December 2018 (excluding branch income)”	LTL 0031557	Confidential
33.	Item 71 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc. income statement for twelve months ended December 2019 (excluding branch income)”	LTL 0024248	
34.	Item 72 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc. income statement for twelve months ended December 2020 (excluding branch income)”	LTL 0024251	
35.	Item 73 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Consumer Inc. income statement for twelve months ended September 2021 (excluding branch income)”	LTL 0024254	
36.	Item 76 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Form 10-K for the fiscal year ended January 3, 2021”		
37.	Item 77 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Form 10-K for the fiscal year ended December 29, 2019”		
38.	Item 78 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Form 10-K for the fiscal year ended December 30, 2018”		
39.	Item 79 to Exhibit B of the Bell Expert Report, entitled, “Johnson & Johnson Form 10-Q for the quarterly period ended October 3, 2021”		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
40.	PowerPoint presentation entitled, "Litigation and Product Liability Update," dated October 13, 2021 with the subheading, "PwC Discussion"	LTL 0021775	Confidential
41.	Item 118 to Exhibit B of the Bell Expert Report, entitled, "Financial Accounting Standards Board ASC 450-20-25"		
42.	Item 131 to Exhibit B of the Bell Expert Report, entitled, "Talc Trial Results.DETAILED VERSION.xlsx"	LTL 0042900	Confidential
43.	Item 158 to Exhibit B of the Bell Expert Report, entitled, "PL Talc-BP STS paid invoice spend from 2010-2021.xlsx"	LTL 0042980	Confidential
44.	Item 132 to Exhibit B of the Bell Expert Report, entitled, "'Talcum Powder,' X Ante Mass Tort Intelligence, January 11, 2022")	LTL 0042901	Confidential
45.	Item 133 to Exhibit B of the Bell Expert Report, entitled, "2016 Talc Verdicts Impact on Enterprise Reputation.pptx."	LTL 0042923	Confidential
46.	Item 151 to Exhibit B of the Bell Expert Report, entitled, "Five Days in December_v2.pptx, January 2019"	LTL 0042926	Confidential
47.	Item 152 to Exhibit B of the Bell Expert Report, entitled, "JJ Corporate Reputation update (Sneed) BoD Update, Nov 2016.pptx, November 2016"	LTL 042953	Confidential
48.	Item 153 to Exhibit B of the Bell Expert Report, entitled, "JJ Reputation – EMEA & Policy Elites 03.23.2016.pptx, March 23, 2016"	LTL 0042965	Confidential
49.	Item 159 to Exhibit B of the Bell Expert Report, entitled, "WW Government Affairs and Policy YE 2018 Briefing 01.2019 vf.pptx, January 29, 2019"	LTL 0042981	Confidential
50.	Item 3 to Exhibit B of the Bell Expert Report, entitled " <i>In re Imerys Talc America, Inc. et al.</i> , In the United States Bankruptcy Court for the District of Delaware, Case No. 19-10289 (LSS), Tenth Amended Joint Chapter 11 Plan of Reorganization of Imerys Talc America, Inc. and its Debtor Affiliates, September 16, 2021" (" <i>Imerys Tenth Amended Plan</i> "), § 3.3		
51.	Item 4 to Exhibit B of the Bell Expert Report, entitled, " <i>In re Imerys Talc America, Inc. et al.</i> , In the United States Bankruptcy Court for the District of Delaware, Chapter 11 Case No. 19-10289 (LSS), Ninth Amended Joint Chapter 11 Plan of Reorganization of Imerys Talc America,		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	Inc. and its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code, dated January 28, 2021”		
52.	Item 5 to Exhibit B of the Bell Expert Report, entitled, “ <i>In re Imerys Talc America, Inc. et al.</i> , In the United States Bankruptcy Court for the District of Delaware, Chapter 11 Case No. 19-10289 (LSS), Order (I) Approving Sale of Substantially All of the Debtors’ Assets Free and Clear of Liens, Claims, Encumbrances, and other Interests, (II) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith and (III) Granting Related Relief, dated November 17, 2020”		
53.	Item 11 to Exhibit B of the Bell Expert Report, entitled, “Trust Distribution procedures, January 28, 2021”		
54.	Item 12 to Exhibit B of the Bell Expert Victoria Lynn Giese, Angela Trentmann, and Susan Vogeler, Plaintiffs, v. Johnson & Johnson and Johnson & Johnson Consumer Inc., Missouri Circuit Court Twenty-Second Judicial Circuit (City of St. Louis) <ul style="list-style-type: none"> Petition in Equity, dated August 24, 2021 		
55.	Exhibit 107 to the deposition of Michelle Ryan, taken January 27, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK)	LTL 0030191	
56.	Project Plato Memorandum of Approval, sent on and dated October 11, 2021	LTL 0030294	
57.	Michelle Ryan’s Consent to the Project Plato Memorandum of Approval, emailed October 11, 2021	LTL 0030223	
58.	Valuation of Old JJCI	LTL 0030450	Confidential
59.	Exhibit 34 to the deposition of Thibaut Mongon, taken January 19, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), entitled, “Johnson & Johnson’s (JNJ) Management Presents at Barclays Global Consumer Staples Conference (Transcript),” dated September 10, 2021		
60.	Exhibit 39 to the deposition of Thibaut Mongon, taken January 19, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), entitled,		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	“Johnson & Johnson (JNJ) Q3 2021 Results – Earnings Call Transcript,” dated October 19, 2021		
61.	February 23, 2016 Email from D. Bass to J. Mesquita et al. re: “URGENT: Talc Update”	JNJTALC001380169	
62.	October 28, 2016 Email from T. Mongon to Consumer AP Employees et al. re: “Talc Update”	JNJ000800251	
63.	December 4, 2019 Email from K. Wengel to JJCUS Enterprise Supply Chain Leadership Team re: “Bernstein Analyst Report for Investor Visit to Consumer Skillman R&D Site,” and attachment	JNJTALC001321834 & JNJTALC001321838	
64.	Exhibit 31 to the deposition of Thibaut Mongon, taken January 19, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), a January 31, 2020 Email from D. Lorensen to M. Sneed et al. re: “INFORM: Talc News next week”	JNJTALC001458089	
65.	May 7, 2020 Email from K. Widmer to T. Mongon re: “Talc Reco,” and attachments	JNJTALC001436789, JNJTALC001436790, & JNJTALC001436791	
66.	U.S. Chamber Institute for Legal Reform, “Gaming the System: How Lawsuit Advertising Drives the Litigation Lifecycle,” dated April 2020	JNJTALC001436791	
67.	Exhibit 26 to the deposition of Thibaut Mongon, taken January 19, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), entitled, “Johnson & Johnson Announces Plans to Accelerate Innovation, Serve Patients and Consumers, and Unlock Value through Intent to Separate Consumer Health Business,” dated November 12, 2021		
68.	Exhibit 44 to the deposition of Thibaut Mongon, taken January 19, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), an October 11, 2021 Email from C. Andrew to T. Mongon re: “Project Plato Approval Memorandum for Approval Today”	LTL 0031330	
69.	Exhibit 9 to the deposition of Thibaut Mongon, taken January 19, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), an October 11, 2021 Approval Request for the Restructuring of Johnson & Johnson Consumer Inc.	LTL 0021791	
70.	Exhibit 36 to the deposition of Thibaut Mongon, taken January 19, 2022 in the matter of <i>In re LTL</i>	LTL 0031328	

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	<i>Management LLC</i> , No. 21-30589 (MBK), an October 11, 2021 Email from C. Andrew to T. Mongon re: “Project Plato Approval Memorandum for Approval Today”		
71.	Exhibit 14 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), a May 3, 2016 Email from J. Ghaim to T. Glasgow re: “Talc Update”	JNJ 000518810	
72.	Exhibit 15 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), a July 19, 2016 Email from J. James to A. Nwaneri re: “New Talc Website Launched”	JNJTALC000851887	
73.	October 21, 2017 Email from M. Saitzyk to C. Goodrich and A. Scavazzini re: “California Talc Verdict Reversed”	JNJTALC001020384	
74.	Exhibit 17 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), a December 15, 2018 Email from D. Lorensen to J. Mesquita et al. re: “Update on talc”	JNJTALC001268780, JNJTALC001268782	
75.	Exhibit 20 to the deposition of Robert Wuesthoff, taken December 22, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), a December 3, 2019 Email from S. Macdonald to D. Jodrey et al. re: “Reuters article on talc in news today”	JNJTALC001331402	
76.	2021-12-08 Second Supplemental Declaration of John K. Kim in Support of Debtor’s Supplemental Memorandum of Law in Support of the Preliminary Injunction Motion, filed in <i>In re LTL Management LLC</i> , No. 21-30589 (MBK) and Exhibits A – P cited therein		
77.	2022-01-05 Third Supplemental Declaration of John K. Kim in Support of Debtor’s Omnibus Reply in Support of the Preliminary Injunction Motion, filed in <i>In re LTL Management LLC</i> , No. 21-30589 (MBK) and Exhibits A – U cited therein		
78.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Expert Report of Matthew Diaz, offered January 28, 2022 		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
79.	January 6, 2020 PowerPoint presentation entitled, “Paddock Enterprises, LLC (An O-I Glass, Inc. Affiliate) Seeks A Final And Equitable Resolution To Its Legacy Asbestos-Related Claims”		
80.	April 26, 2021 O-I press release entitled, “O-I Glass Announces Agreement of Potential Plan of Reorganization for Paddock Subsidiary”		
81.	<i>In re Paddock Enterprises, LLC</i> , No. 20-03041, in the United States Bankruptcy Court for the District of Delaware <ul style="list-style-type: none"> Declaration of David J. Gordon, President and Chief Restructuring Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings, filed April 23, 2021 		
82.	<i>In re Garlock Sealing Technologies LLC, et al.</i> , No. 10-BK-31607, in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> Disclosure Statement for Modified Joint Plan of Reorganization of Garlock Sealing Technologies LLC, et al. and Oldco, LLC, Proposed Successor by Merger to Coltec Industries Inc, filed July 29, 2016 		
83.	October 12, 2021 document entitled, “Amended and Restated Funding Agreement,” between Johnson & Johnson, Johnson & Johnson Consumer Inc., and LTL Management LLC	LTL 0000001	
84.	<i>In re Aldrich Pump LLC, et al.</i> , No. 20-30608 (JCW), in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> Expert Report of Matthew Diaz, dated February 12, 2021 		
85.	<i>In re DBMP LLC</i> , No. 20-30080 (JCW), in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> Expert Report of Matthew Diaz, dated October 20, 2020 		
86.	Exhibit 10 to the deposition of Michelle Goodridge, taken December 20, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), a May 19, 2020 Email from K. Wallace to	JNJTALC001436896	

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	L. Deo et al. re: "CONFIDENTIAL: Final Materials for Today"		
87.	Oasis Financial website post entitled, "10 of the Largest Personal Injury Verdicts & Settlements in History"		
88.	<i>In re LTL Management LLC</i> , No. 21-30589, in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> Supplemental Declaration of John K. Kim in Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motions, filed October 21, 2021 		
89.	<i>In re LTL Management, LLC</i> , No. 21-03032 (JCW), in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division <ul style="list-style-type: none"> Declaration of John K. Kim in Support of First Day Pleadings, filed October 14, 2021 		
90.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Debtor's Objection to Motions to Dismiss Chapter 11 Case, filed December 22, 2021 		
91.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Request for Judicial Notice, filed by the Official Committee of Talc Claimants II on February 8, 2022 		
92.	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Canadian Class Action Plaintiffs' Opposition to Motions to Dismiss Chapter 11 Case, filed February 8, 2022 		
93.	<i>Lee v. A.W. Chesterton Company</i> , No. FCS050176, in the Superior Court of the State of California in and for the County of Solano <ul style="list-style-type: none"> Transcript of the Deposition of John Hopkins, PH.D., taken February 7, 2019 		
94.	<i>Ingham v. Johnson & Johnson</i> , No. 1522-CC10417-01, in the Circuit Court of the City of St. Louis, State of Missouri		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	<ul style="list-style-type: none"> Trial Transcript from June 14, 2018 		
95.	<p><i>Giese v. Johnson & Johnson</i>, Case No. 1522-CC0041902, in the Circuit Court of the City of St. Louis, State of Missouri</p> <ul style="list-style-type: none"> Trial Transcript from Monday, September 27, 2021 		
96.	<p><i>Forrest v. Johnson & Johnson</i>, No. 1522-CC00419-02, in the Circuit Court of the City of St. Louis, State of Missouri</p> <ul style="list-style-type: none"> Trial Transcript, Volume 15B, from December 20, 2019 		
97.	<p><i>Johnson v. Johnson & Johnson</i>, No. JCCP 4674/20STCV17335, in the Superior Court of the State of California for the County of Los Angeles</p> <ul style="list-style-type: none"> Trial Transcript, Wednesday, October 6, 2021 		
98.	Publication entitled, "Financial Accounting Standards Board, Statement of Financial Accounting Concepts No. 5," dated December 1984		
99.	Publication entitled, "Financial Accounting Standards Board, Statement of Financial Accounting Concepts No. 6," dated December 1985		
100	Exhibit 234 to the deposition of Adam Lisman, taken February 8, 2021 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), Johnson & Johnson Consumer Inc. Balance Sheet for the period ending September 2021	LTL 0024253	
101	Exhibit 235 to the deposition of Adam Lisman, taken February 8, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), Johnson & Johnson Consumer Inc. Income Statement for the period ending September 2021	LTL 0024254	
102	Exhibit 284 to the deposition of Adam Lisman, taken February 8, 2022 in the matter of <i>In re LTL Management LLC</i> , No. 21-30589 (MBK), a document entitled, "Worldwide Financial Procedures, 330Ba – Legal Fees"	LTL 0021763	
103	Publication entitled, "Financial Accounting Standards Board Conceptual Framework, Statement of Financial Accounting Concepts No. 8, Conceptual Framework for Financial Reporting,		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	Chapter 4, <i>Elements of Financial Statements</i> ,” dated December 2021		
104	<i>In re LTL Management LLC</i> , No. 21-30589 (MBK), in the United States Bankruptcy Court for the District of New Jersey <ul style="list-style-type: none"> Expert Report of Saul E. Burian, dated January 28, 2022 		
105	Transcript of the deposition of Thibaut Mongon, taken January 19, 2022, in <i>In re LTL Management LLC</i> , No. 21-30589 (MBK)		
106	<i>In re Bestwall LLC</i> , 605 B.R. 43 (Bankr. W.D.N.C. 2019) (Bestwall Dismissal Opinion)		
107	Royalty A&M DCF Analysis	LTL 0029874	Confidential
108	April 30, 2019 Email from P. Kwan to D. Kaplan re: “Talc”	SPGI0000080	Confidential
109	Praedicat Inc. article entitled, “Talc: the next wave of asbestos litigation?”	SPGI0000081	Confidential
110	The Unpredictable Cost of Latent Catastrophes, Patricia Kwan		
111	Johnson & Johnson Form 10-K for the fiscal year ended January 3, 2021	LTL 0029717	

The Debtor reserves all rights to amend this preliminary hearing exhibit list. The Debtor reserves the right to identify and admit these or additional exhibits in rebuttal as necessary and appropriate. The Debtor reserves the right to use or admit exhibits identified by any other Party. The Debtor also may use demonstratives during its hearing presentation.

Dated: February 11, 2022

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ATTORNEYS FOR DEBTOR

EXHIBIT B

From: Benson, W Lydell <WLBenson@brownrudnick.com>
Sent: Sunday, February 13, 2022 9:11 PM
To: rebecca_earl@njb.uscourts.gov; Alexandra_Grant@njb.uscourts.gov
Cc: Donald Clarke; D'Aquila, Danielle; jmorris@pszjlaw.com; Cary Joshi; Flath, Nicholas; rpfister@ktbslaw.com; Rasmussen, Mark W.
Subject: In re LTL Management - Movants' Amended Hearing Exhibit List and Exhibits
Attachments: Movants' Amended Preliminary Hearing Exhibit List (2.13.2022).pdf.docx.pdf

[External]

Dear Ms. Earl and Ms. Grant:

Pursuant to Judge Kaplan's request at our hearing on 2/10/22, below please find a secure link to Movants' Exhibits for the hearing on the motion to dismiss. Movants' exhibit list is attached hereto. The parties have agreed that by providing the Court with copies of their respective exhibit lists, they do not waive any objections with regard to the exhibits.

Additionally, the exhibits actually used in the hearing will likely be far fewer than what is contained in this list. If the Movants plan to use hardcopy documents with a witness, the Movants will prepare binders for the witness, the Court, and the Debtor. Movants will provide copies of these witness binders the morning of the day the witness is expected to testify at the hearing. Movants reserve all rights to enter into evidence exhibits not included in a particular witness's binder.

 [Movants' Preliminary Hearing Exhibits](#)

Respectfully Submitted,
Lydell

brownrudnick

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Associate

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Inclusion and self-expression are professional and personal values of mine.
One way I practice these values is to share my preferred gender pronouns.
Mine are he / him / his.

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Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation (EU/2016/679) or in the UK's Data Protection Act 2018) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and when and how we intend to transfer it outside the European Economic Area.

In re LTL Management LLC
Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
DEPOSITION EXHIBITS, CLOSING BINDER, AND JUDICIAL NOTICE DOCUMENTS		
1.01	Cert. of Incorporation	LTL 0001058-LTL 0001061
1.02	By-Laws	LTL 0001062-LTL 0001074
1.03	Subscription Agreement	LTL 0001075-LTL 0001076
1.04	Stock Power	LTL 0001077-LTL 0001078
1.05	Company Resolutions	LTL 0001079-LTL 0001091
1.06	Company Resolutions	LTL 0001092-LTL 0001111
1.07	Letter of Resignation	LTL 0001112-LTL 0001113
1.08	Company Resolutions	LTL 0001114-LTL 0001115
1.09	Cert. of Filing	LTL 0001116-LTL 0001119
1.10	LLC Agreement	LTL 0001120-LTL 0001134
1.11	Agreement and Plan of Merger	LTL 0001135-LTL 0001144
1.12	Filing Certification	LTL 0001145-LTL 0001146
1.13	Cert. of Merger	LTL 0001147-LTL 0001150
1.14	Company Resolutions	LTL 0001151-LTL 0001158
1.15	Company Resolutions	LTL 0001159-LTL 0001176
1.16	Company Resolutions	LTL 0001177-LTL 0001191
1.17	Company Resolutions	LTL 0001192-LTL 0001204
1.18	Company Resolutions	LTL 0001205-LTL 0001221
1.19	Company Resolutions	LTL 0001222-LTL 0001234
1.20	Funding Agreement	LTL 0001235-LTL 0001254
1.21	Commitment and Loan Agreement	LTL 0001255-LTL 0001266

In re LTL Management LLC
Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
1.22	Company Resolutions	LTL 0001267-LTL 0001302
1.23	Company Resolutions	LTL 0001303-LTL 0001326
1.24	Plan of Divisional Merger	LTL 0001327-LTL 0001390
1.25	Schedules	LTL 0001391-LTL 0001817
1.26	Cert. of Merger	LTL 0001818-LTL 0001828
1.27	Cert. of Formation	LTL 0001829-LTL 0001831
1.28	LLC Agreement	LTL 0001832-LTL 0001846
1.29	Cert. of Formation	LTL 0001847-LTL 0001849
1.30	LLC Agreement	LTL 0001850-LTL 0001866
1.31	Divisional Merger Support Agreement	LTL 0001867-LTL 0001873
1.32	Services Agreement	LTL 0001874-LTL 0001889
1.33	Secondment Agreement	LTL 0001890-LTL 0001900
1.34	Company Resolutions	LTL 0001901-LTL 0001969
1.35	Company Resolutions	LTL 0001970-LTL 0002036
1.36	Company Resolutions	LTL 0002037-LTL 0002056
1.37	Chenango One LLC – Unanimous Written Consent In Lieu of a Meeting of the BoD	LTL 0002057-LTL 0002098
1.38	Company Resolutions	LTL 0002099-LTL 0002117
1.39	Company Resolutions	LTL 0002118-LTL 0002131
1.40	Company Resolutions	LTL 0002132-LTL 0002162
1.41	Agreement and Plan of Merger	LTL 0002163-LTL 0002173
1.42	Cert. of Merger w/ Name Change	LTL 0002174-LTL 0002181

In re LTL Management LLC
Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
1.43	Cert. of Merger	LTL 0002182-LTL 0002185
1.44	Company Resolutions	LTL 0002186-LTL 0002201
1.45	Company Resolutions	LTL 0002202-LTL 0002215
1.46	Company Resolutions	LTL 0002216-LTL 0002231
1.47	Company Resolutions	LTL 0002232-LTL 0002245
1.48	Plan of Conversion of Chenango One LLC to LTL Management LLC	LTL 0002246-LTL 0002274
1.49	Cert. of Conversion	LTL 0002275-LTL 0002278
1.50	Art. of Organization	LTL 0002279-LTL 0002282
1.51	Operating Agreement	LTL 0002283-LTL 0002299
1.52	Funding Agreement	LTL 0002300-LTL 0002320
1.53	Divisional Merger Support Agreement	LTL 0002321-LTL 0002327
1.54	Services Agreement	LTL 0002328-LTL 0002343
1.55	Services Agreement	LTL 0002344-LTL 0002357
1.56	Secondment Agreement	LTL 0002358-LTL 0002368
1.57	Commitment and Loan Agreement	LTL 0002369-LTL 0002380
1.58	Company	LTL 0002381-LTL 0002413
1.59	Company	LTL 0002414-LTL 0002445
1.60	Company	LTL 0002446-LTL 0002465
1.61	LTL Management LLC – Unanimous Written Consent In Lieu of a Meeting of the BoD	LTL 0002466-LTL 0002476
1.62	Company Resolutions	LTL 0002477-LTL 0002482
1.63	Company Resolutions	LTL 0002483-LTL 0002486

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
1.64	Art. of Organization	LTL 0002487-LTL 0002491
1.65	Operating Agreement	LTL 0002492-LTL 0002508
1.66	Purchase Agreement	LTL 0002509-LTL 0002540
1.67	Purchase Agreement	LTL 0002541-LTL 0002571
1.68	Purchase Agreement	LTL 0002572-LTL 0002602
1.69	Purchase Agreement	LTL 0002603-LTL 0002631
1.70	Services Agreement	LTL 0002632-LTL 0002646
1.71	Services Agreement	LTL 0002647-LTL 0002662
1.72	Facility Agreement	LTL 0002663-LTL 0002670
1.73	Operating Agreement	LTL 0002671-LTL 0002687
1.74	Company Resolutions	LTL 0002688-LTL 0002772
1.75	Company Resolutions	LTL 0002773-LTL 0002791
1.76	Company Resolutions	LTL 0002792-LTL 0002978
1.77	Company Resolutions	LTL 0002979-LTL 0003012
1.78	Company Resolutions	LTL 0003013-LTL 0003047
1.79	Company Resolutions	LTL 0003048-LTL 0003066
1.80	Company Resolutions	LTL 0003067-LTL 0003086
2	Form 10-Q for the period ending 10.3.2021	N/A
3	J&J, JJCI, and LTL Cycle Demonstrative	N/A
4	Attachment A – Insurers Represented by Mendes & Mount LLP (Dkt. No. 206)	N/A
5	Insurance Declarations	LTL 0007703-LTL 0007713

In re LTL Management LLC
Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
6	Intentionally Omitted	Intentionally Omitted
7	Company Organizational Structural as of 10.11.2021	N/A
8	Intentionally Omitted	Intentionally Omitted
9	Approval Request for Restructuring of JJCI – Memo of Approval	LTL 0021791-LTL 0021801
10	Email Re: Final Materials for Today	JNJTALC 001436896 – JNJTALC 001436903
11	List of Individuals Involved in Approvals for the 2021 Corporate Restructuring	N/A
12	Form 8-K dated 11.15.2021	N/A
13	Email Re: URGENT INFORM: Bloomberg Businessweek story has published	N/A
14	Email Re: Talc Update	N/A
15	Email Re: New Talc Website Launched	N/A
16	Email Re: INFORM: Talc Trial Update	N/A
17	Email Re: Update on talc	N/A
18	Email Re: Important Conf Call: December 17 th Update on Talc	N/A
19	Email Re: Recall Materials	N/A
20	Email Re: Reuters article on talc in news today	N/A
21	Letter Re: LTL Management LLC – Valuation of potential legacy talc liabilities	LTL 0022393-LTL 0022400
22	Presentation Re: Litigation and Product Liability Update dated	LTL 0021775-LTL 0021782
23	Minutes of Board of Managers	LTL 0019184-LTL 0021782
24	Schedules of Assets and Liabilities for LTL Management LLC (Dkt. No. 728)	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
25	Letter from U.S. Congress Re: "J&J's efforts to manipulate bankruptcy laws . . ."	N/A
26	J&J Press Release Re: Johnson & Johnson Announces Plans to Accelerate Innovation, Serve Patients and Consumers, and Unlock Value through Intent to Separate Consumer Health Business	N/A
27	Notice of Debtor's Motion for Order Appointing Joseph W. Grier, III as Legal Rep. for Future Talc Claimants	N/A
28	Motion of the Official Committee of Talc Claimants to Dismiss Debtor's Ch. 11 Case	N/A
29	Email Re: FW: Bernstein Analyst Report for Investor Visit to Consumer Skillman R&D Site	JNJ TALC 001321834-JNJ TALC 001321854
30	Intentionally Omitted	Intentionally Omitted
31	Email Re: INFORM: Talc News next Week	JNJ TALC 001458089
32	Presentation Re: J&J Q2 Results	N/A
33	Presentation Re: J&J 2 nd Quarter 2021 Earnings Call dated 7.21.2021	N/A
34	J&J's Management Presents at Barclays Global Consumer Staples Conference (Transcript)	N/A
35	Email Re: 2022 adjusted view	LTL 0029993-LTL 0029994
36	Email Re: Project Plato Approval Memorandum for Approval Today	LTL 0031328-LTL 0031329
37	Email Re: PRIVILEGED & CONFIDENTIAL – Priority Briefing: Project Plato	LTL 0031447-LTL 0031448
38	Intentionally Omitted	Intentionally Omitted

In re LTL Management LLC

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
39	J&J's Q3 2021 Results – Earnings Call (Transcript)	N/A
40	Email Re: Project Plato	LTL 0031443-LTL 0031444
41	Debtor's Privilege Log related to Custodial Files of T. Mongon, January 17, 2022	N/A
42	Meeting of BoD via Zoom	LTL 0019827-LTL 0019830
42-A	Meeting of BoD via Zoom (unredacted version)	LTL 0019827-LTL 0019830
43	Email Re: Plato Update	LTL 0031445-LTL 0031446
44	Email Re: Project Plato Approval Memorandum for Approval Today	LTL 0031330-LTL 0031341
45	Email Re: JNJ: WSJ: J&J Places Talc Injury Claims in Bankruptcy	LTL 0029978-LTL 0029986
46	Intentionally Omitted	Intentionally Omitted
47	Project Plato Master Q&A dated 10.10.2021	N/A
48-49	Intentionally Omitted	Intentionally Omitted
50	Press Release Re: J&J Takes Steps to Equitably Resolve All Current and Future Talc Claims	LTL 0030210-LTL 0030212
51	Intentionally Omitted	Intentionally Omitted
52	Mesothelioma Baby Powder Verdicts	N/A
53	Email/Meeting Invite: Re: Project Plato	LTL 0032091-LTL 0032093
54	Email/Meeting Invite: Re: Project Plato	LTL 0032094-LTL 0032096
55	John Kim resignation letter	LTL 0022388-LTL 0022392
56	Leader Update on Talc Litigation	LTL 0030411-LTL 0030412
57	Dickinson Offer Letter for Secondment	LTL 0030612-LTL 0030613
58	Dickinson Plato US Retention Bonus Agreement	LTL 0030614- LTL 0030617

In re LTL Management LLC
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Exhibit	Document Description	Bates Number
59	Talking Points from Communications to Dickinson re: Project Plato	LTL 0030422
60	Scenario A Press Release	LTL 0030232
61	Email re: Project Plato	LTL 0032149
62	Email re: Project Plato – LTL Meeting	LTL 0030440-LTL 0030442
63	Email re: Project Plato – LTL Meeting	LTL 0030428-LTL 0030430
64	Email re: Communications Briefing Today	LTL 0032492
65	Email re: FINAL Project Plato CFO Announcement Template	LTL 0030426
66	Project Plato Officer Announcement	LTL 0030427
67	Presentation from J&J Law Department re: Project Plato	LTL 0031349-LTL 0031442
68	JJCI Valuation	LTL 0030450-LTL 0030454
69	Monthly Operating Report (01.22.2022)	N/A
70	Email re: Project Plato	LTL 0032168- LTL 0032169
71	Email re: Project Plato	LTL 0032884- LTL 0032886
72-99	Intentionally Omitted	Intentionally Omitted
100	WSJ Article re: Supreme Court Won't Consider J&J Challenge to Baby Powder Judgment	N/A
101	Email re: Imerys Questions	LTL 0030200
102	Email re: Plato	LTL 0033527-LTL 0033528
103	Email re: Litigation follow-up	LTL 0030205-LTL 0030206
104	Email re: [EXTERNAL] Litigation follow-up	LTL 0030203-LTL 0030204
104-A	Email re: [EXTERNAL] Litigation follow-up (unredacted version)	LTL 0030203-LTL 0030204

In re LTL Management LLC
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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
105	Email re: [EXTERNAL] Litigation follow-up	LTL 0030188-LTL 0030189
106	Email re: J&J weighing bankruptcy plan as it considers offloading baby powder liabilities: report Fox Business	LTL 0030190
106-A	Email re: J&J weighing bankruptcy plan as it considers offloading baby powder liabilities: report Fox Business (unredacted version)	LTL 0030190
107	Email re: Litigation follow-up	LTL 0030191-LTL 0030193
108	Email re: [EXTERNAL] S&P Ratings – Request for more context around reports of lawyers indicating possibility of putting talc liabilities into bankruptcy	LTL 0030193
109	Email re: [EXTERNAL] S&P Ratings – Request for more context around reports of lawyers indicating possibility of putting talc liabilities into bankruptcy	LTL 0030194
110	Email re: Litigation follow-up	LTL 0030195-LTL 0030197
111	Email re: J&J Legal Rep Floats Subsidiary Bankruptcy Filing Over Talc Lawsuits – The Wall Street Journal	LTL 0030198
112	Intentionally Omitted	Intentionally Omitted
113	J&J Form 10-Q as of 7.4.21	N/A
114	PwC update re: Litigation & Product Liability YE 2018 Update	LTL 0030605-LTL 0030611
115	PwC update re: Litigation & Product Liability 4Q 2019 Update	LTL 0021767-LTL 0021774
116	PwC discussion re: Litigation & Product Liability Update, dated Oct. 13, 2021	LTL 0021775-LTL 0021782
117	Email re: SEEKING ALPHA: J&J agrees to delay bankruptcy plan for talc liabilities	LTL 0030199

In re LTL Management LLC

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Exhibit	Document Description	Bates Number
118	Email re: J&J Reputation Radar August 25, 2021	LTL 0030180-LTL 0030187
119	Email re: Project Plato – Treasury Contract Review	LTL 0030174-LTL 0030175
120	Email re: Project Plato - Restructuring Plan	LTL 0030176
121	Meeting Invite/Email re: Project Plato	LTL 0033521-LTL 0033523
122	Email re: Plato – timing of events update	LTL 0030023-LTL 0030026
123	Email re: Plato	LTL 0030170-LTL 0030173
124	Meeting Acceptance re: Project Plato - Plan for Document Review	LTL 0033530
125	Email re: Project Plato Draft Memo of Approval	LTL 0030027-LTL 0030031
126	Email re: Project Plato Approval Memo for Approval Today	LTL 0031343
127	Intentionally Omitted	Intentionally Omitted
128	Trust Governance	N/A
129	J&J NSYE Overview	N/A
130	J&J Form 8-K dated November 15, 2021	N/A
131	Email re: [EXTERNAL] Q2 Legal Letters	LTL 0030402-LTL 0030404
132	Email re: FYI: Expect WSJ Story on Imerys Bankruptcy	LTL 0032394
133	Email re: Talc Bankruptcy Issues	LTL 0036457-LTL 0036458
134	Email re: (subject redacted)	LTL 0035376-LTL 0035378
135	Meeting Invite re: J&J – Call to Discuss Potential Restructuring Alternatives	LTL 0036459-LTL 0036461
136	Meeting Invite re: Project Plato	LTL 0036462-LTL 0036463
137	Meeting Invite from C. Andrew to Kim et al re: Project Plato Kick-Off Meeting	LTL 0036469-LTL 0036471

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
138	Email from J. Sargent to Kim et al re Reuters seeking comment on talc-related story	LTL 0035243-LTL 0035245
139	Email re: WSJ How Bankruptcy Could Help J&J Corral Vast Talc Litigation	LTL 0033779-LTL 0033781
140	Committee on Oversight and Reform Letter re: J&J plans to seek bankruptcy	LTL 0033998-LTL 0034003
141	Email re: u guys available quick call re PLATO?	LTL 0036191
142	Meeting Invite re: PLATO	LTL 0036370-LTL 0036371
143	Email re: Letter And Letter re: Shower to Shower Asset Purchase Agreement and Indemnification Agreement	LTL 0036129 & LTL 0036543
144	Information Brief of LTL Management LLC	LTL 0030038-LTL 0030169
145	Meeting Invite re: Project Plato – First (Rough) Draft of Info Brief Material	LTL 0036410
146	Meeting Acceptance re: Plato – Venue Call	LTL 0036222
147	Meeting Invite re PLATO – Future Claimants	LTL 0035790-LTL 0035791
148	Email re: Plato – timing of events update	LTL 0030023-LTL 0030025
149	Email re: Project Plato – Schedule of Events (Week of October 10th)	LTL 0036234
150	Offer Letter to J. Kim to join J&J as Chief Legal Officer	LTL 0042767-LTL 0042781
151	Email re: Project Plato	LTL 0035415
152	Email re: LTL Meeting	LTL 0032160-LTL 0032161
153	Meeting Invite re: LTL Meeting	LTL 0032162-LTL 0032163

In re LTL Management LLC

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Exhibit	Document Description	Bates Number
154	Draft Settlement Facility Agreement by and Among J&J, JJCI, LTL and US Bank Nat'l Assoc.	LTL 0036485-LTL 0036511
155	Project Plato Messaging	LTL 0036474-LTL 0036481
156	RISTESUND et al v. J&J et al (Judgment)	N/A
157	Verdict A	N/A
158	Debtor's Opening Overview of Case (12.15.21)	N/A
159	Funding Agreement Slide	N/A
160	Brief re: J&J, Along with Old JJCI Has Been Held Separately and Individually Responsibly for Liability in Many Recent Talc Powder Rulings	N/A
161	Debtor's Supplemental Response to Official Committee of Talc Claimants' RPD No. 40	N/A
162-199	Intentionally Omitted	Intentionally Omitted
200	Email re: Project Plato	LTL 0035360-LTL 0035361
201	Email re: Talc - Plato	LTL 0034782-LTL 0034783
202	Email from McCann to C. Andrew re: Plato Discussion	LTL 0038235-LTL 0038237
203	Email re: Project Plato – Project Management Support	LTL 0038241-LTL 0038243
204	Email/Meeting Invite re: Project Plato	LTL 0038247-LTL 0038249
205	Email re: Project Plato Kickoff Call	LTL 0037044-LTL 0037046
206	Meeting Invite re: Project Plato Kickoff Call	LTL 0041765
207	Meeting Invite re: Plato	LTL 0036395-LTL 0036396
208	Meeting Invite re: PLATO – odds & ends with JD	LTL 0036397-LTL 0036398

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
209	Meeting Invite re: PLATO – Call with JD	LTL 0036399-LTL 0036400
210	Email re: [EXTERNAL] WSJ query re: Missouri TRO against J&J talc bankruptcy	LTL 0036237-LTL 0036239
211	Meeting Invite re: Call with JD re PLATO	LTL 0036217-LTL 0036218
212	Email from Kim to Haas re: Plato	LTL 0036219
213	Meeting Invite re: Call with JD re PLATO	LTL 0036407-LTL 0036408
214	Meeting Invite re: Plato – Venue Call	LTL 0036420-LTL 0036421
215	Email re: Project Plato Meeting	LTL 0035751
216	Meeting Invite re: PLATO	LTL 0036427-LTL 0036428
217	Email re: Project Plato – Accounting Workstream	LTL 0035762-LTL 0035765
218	Email re: Project Plato: Process for Execution of Restructuring Documents	LTL 0035776-LTL 0035777
219	Meeting Invite re: Project Plato – Information Gathering	LTL 0036429-LTL 0036430
220	Meeting Invite re: (subject redacted)	LTL 0035792-LTL 0035794
221	Meeting Invite re: PLATO - Comms	LTL 0036433-LTL 0036434
222	Meeting Invite re: Project Plato	LTL 0035796-LTL 0035797
223	Email re Project Plato	LTL 0035802
224	Meeting Invite re: Project Plato Schedules Review	LTL 0035798-LTL 0035801
225	Email re: Project Plato – Schedule Wording	LTL 0036442-LTL 0036444
226	Email re: Plato-Communications	LTL 0035819-LTL 0035821
227	Meeting Invite re: PLATO – Quick Connect	LTL 0036451-LTL 0036452
228	Email re: Noon meeting	LTL 0035410

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Exhibit	Document Description	Bates Number
229	Debtor's Responses and Objections to First Set of Interrogatories by Arnold & Itkin LLP in Connection with MTD	N/A
230	Debtor's Amended Responses and Objections to Second Set of Interrogatories By A&I LLP in Connection with MTD	N/A
231	A&I's Amended Notice of Deposition of LTL Management LLC, Pursuant to FRBP 7030(b)(6)	N/A
232	JJCI Balance Sheet Period Ending 12.2020 (12.09.21)	LTL 0024250
233	JJCI Income Statement Period from Period 1.2020 to 12.2020 (12.09.21)	LTL 0024251-LTL 0024252
234	JJCI Balance Sheet Period Ending 9.2021	LTL 0024253
235	JJCI Income Statement Period from Period 1.2021 to 9.2021	LTL 0024254-LTL 0024255
236	Estimated Discounted Cash Flow of \$367MM 2022 – 2031	LTL 0029874-LTL 0029879
237-239	Intentionally Omitted	Intentionally Omitted
240	Services Agreement	LTL 0002632-LTL 0002646
241	Services Agreement	LTL 0002647-LTL 0002662
242	Intentionally Omitted	Intentionally Omitted
243	Royalty A&M Unanimous Written Consent in Lieu of a Meeting of the Board of Managers	LTL 0002792-LTL 0002978
244-247	Intentionally Omitted	Intentionally Omitted
248	JJCI Unanimous Written Consent in Lieu of a Meeting of the Board of Managers	LTL 0002688-LTL 0002772
249	LTL Responses to Requests for Admissions	N/A
250	Verdict Form, <i>Deane Berg v. Johnson & Johnson, et al.</i> , U.S.	N/A

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Exhibit	Document Description	Bates Number
	Dist. Ct. South Dakota, Civ. 09-4179-KES; October 4, 2013.	
251	Verdict, <i>Estate of Fox v. Johnson & Johnson</i> , Missouri 22 nd Judicial Circuit, St. Louis City, No. 1422-CC09012; February 22, 2016.	N/A
252	Verdict Form, <i>Gloria Ristesund v. Johnson & Johnson, et al.</i> , Missouri 22 nd Judicial Circuit, St. Louis City, No. 1422-CC09012-01; May 2, 2016.	N/A
253	Verdict Form, <i>Deborah Giannecchini v. Johnson & Johnson et al</i> , JVR No. 1611010003, Missouri 22 nd Judicial Circuit, St. Louis City, No. 1422-CC09012; October 27, 2016.	N/A
254	Verdict Form, <i>Lois Slemp v. Johnson & Johnson</i> , Missouri 22 nd Judicial Circuit, St. Louis City, No. 1422-09326; May 4, 2017.	N/A
255	Verdict Form, <i>Steven Lanzo v. Johnson & Johnson Consumer, Inc., et al.</i> , New Jersey Superior Court, Middlesex County, Docket No.: MID-L-7385-16; April 11, 2018.	N/A
256	Intentionally Omitted	Intentionally Omitted
257	Jury Verdict Form (Phase 1), <i>Joanne and Gary Anderson v. Johnson & Johnson and JJCI</i> , California Superior Court, Los Angeles Co., Case No. JCCP 4674/BC666513; May 23, 2018.	N/A
258	Jury Verdict Form (Phase 2-Punitive Damages), <i>Joanne and Gary Anderson v. Johnson & Johnson and JJCI</i> , California Superior Court, Los Angeles Co.,	N/A

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Exhibit	Document Description	Bates Number
	Case No. JCCP 4674/BC666513; May 24, 2018.	
259	Verdict Form, <i>Teresa Leavitt v. Johnson & Johnson et al</i> , California Superior Court, Alameda Co., Case No. RG17882401; March 13, 2019.	N/A
260	Verdict Transcript, <i>Donna and Robert Olson v. Johnson & Johnson Consumer Inc., et al</i> , Supreme Court of New York County, New York, Index No. 19038/2017; May 21, 2019.	N/A
261	Punitive Damages Verdict Transcript, <i>Donna and Robert Olson v. Johnson & Johnson Consumer Inc., et al</i> ; Supreme Court of New York County, New York, Index No. 19038/2017; May 31, 2019.	N/A
262	Verdict Form, <i>Patricia Schmitz v. Johnson & Johnson et al</i> , California Superior Court, Alameda County, Case No. RG189231615; June 12, 2019.	N/A
263	Jury Verdict Sheets - Amended, <i>Douglas and Roslyn Barden, et al v. Johnson & Johnson et al.</i> , New Jersey Superior Court, Middlesex County, Docket No.: MID-L-1809-17 AS; September 11, 2019.	N/A
264	Special Verdict, <i>Nancy Cabibi and Phil Cabibi v. Johnson & Johnson and Johnson & Johnson Consumer Inc.</i> , California Superior Court, Los Angeles Co., Case No. BC665257; September 27, 2019.	N/A
265	Phase 2 Verdict Transcript, <i>Douglas and Roslyn Barden, et al., v. Brenntag North America, et al.</i> , New Jersey Superior Court,	N/A

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Exhibit	Document Description	Bates Number
	Middlesex County, Docket No.: MID-1809-17AS; February 2, 2020.	
266	Verdict Sheet, <i>Blanca Moure-Cabrera v. Johnson & Johnson Consumer Inc. and Johnson & Johnson</i> , Circuit Court of Miami-Dade County, Florida (11 th Judicial Circuit), Case No. 19-000727; February 27, 2020.	N/A
267	Verdict Form, <i>Christina Prudencio v. Johnson & Johnson, et al.</i> , California Superior Court, Alameda Co., Case No. RG20061303; August 23, 2021.	N/A
268	Verdict on Punitive Damages, <i>Christina Prudencio v. Johnson & Johnson, et al.</i> , California Superior Court, Alameda Co., Case No. RG20061303; August 27, 2021.	N/A
269	Verdict Form, <i>Shawn Johnson and Holly Johnson v. Johnson & Johnson, et al.</i> , California Superior Court, Los Angeles Co., Case No. 20STCV17335; October 12, 2021.	N/A
270	Johnson & Johnson's Motion for Entry of Order Modifying Automatic Stay, <i>In re Imerys Talc America, Inc., et al.</i> , Dist. Del. Bankr., 19-10289, Doc. No. 1567; March 20, 2020.	N/A
271	Johnson & Johnson's Omnibus Reply in Support of J&J's Motion for Entry of Order Modifying Automatic Stay, <i>In re: Imerys Talc America, Inc., et al.</i> , Dist. Del. Bankr., 19-10289, Doc. No. 1769; May 28, 2020.	N/A
272	Cal. Civ. Proc. Code § 377.34 (West 2022)	N/A

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Exhibit	Document Description	Bates Number
273	Ind. Code § 34-9-3-1	N/A
274	Ariz. Rev. Stat. § 14-3110	N/A
275	Colo. Rev. Stat. § 13-20-101	N/A
276	Idaho Code § 5-327	N/A
277	Standing Case Management Order for all Asbestos Personal Injury Cases for the Circuit Court Third Judicial District for Madison County, Illinois entered on August 19, 2016	N/A
278	California Code of Civil Procedure Section 36	N/A
279	Order, Circuit Court, Baltimore City, Docket No.: 24X87048500; April 7, 2021.	N/A
280	Procedure for Resolving Attorneys' Civil Trial Scheduling Conflicts, Administrative Office of the Courts, State of New Jersey Directive No. 12-05; June 30, 2005.	N/A
281	Order, Court of the State of New York, <i>In re: New York City Asbestos Litigation</i> (NYCAL), Index No.: 782000/2017; June 20, 2017.	N/A
282	Case Management Order, <i>In re: Minnesota Asbestos Litigation</i> , State of Minnesota, District Court Second Judicial District, Ramsey County, File No.: 62-C8-94-002875; June 29, 2020.	N/A
283	<i>Robert Ingham v. Johnson & Johnson, et al.</i> , 608 S.W.3d 663, 724 (Mo. Ct. App. 2020), <i>reh'g and/or transfer denied</i> (July 28, 2020), <i>transfer denied</i> (Nov. 3, 2020), <i>cert. denied</i> , 141 S. Ct. 2716, 210 L. Ed. 2d 879 (2021).	N/A

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Exhibit	Document Description	Bates Number
284	J&J Worldwide Financial Procedures	LTL 0021763-LTL 0021766
285	Email re: 1 on 1 with Joe	LTL 0030291-LTL 0030292
286	Email re: Quick Discussion re Talc – Attorney Communication	LTL 0044004
287	Email re: Attorney Privileged	LTL 0044046-LTL 0044049
288	Email re: Catch up with Adam & Bob re PLATO	LTL 0032138-LTL 0032138
289	Intentionally Omitted	Intentionally Omitted
290	Email and letter re: Audit Committee Review Sept 13 2021 Bob Script adam edit	LTL 0030213-LTL 0030215
291	J&J Meeting of the Audit Committee of the Board of Directors, September 13, 2021	LTL 0042801-LTL 0042805
292	Email re: Call with Erik re: Project Plato	LTL 0030284
293	Email re: Plato – LE Set Up	LTL 0043967
294	Intentionally Omitted	Intentionally Omitted
295	Email re: Plato – LE Set Up	LTL 0043824-LTL 0043824
296	Email re: Significant subs	LTL 0043970
297	Email re: Plato	LTL 0043975-LTL 0043976
298	Email and Meeting Invite re: Project Plato – Funding Agreement	LTL 0043982-LTL 0043984
299	Email re: Plato – timing of events update	LTL 0043919
300	Email re: Plato	N/A
301	Email re: Talc Liability Positions Q3 2021	LTL 0043998-LTL 0044000
302	Email re: DRAFT Q3 Non-GAAP Reconciliation	LTL 0043796-LTL 0043797
303	Email re: Draft Plato Press Release	LTL 0043834-LTL 0043835

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Exhibit	Document Description	Bates Number
304	Email re: [EXTERNAL] Re: Draft Plato Press Release	LTL 0043836-LTL 0043837
305	Email re: DRAFT Project Plato Master Q-A 10.10 MM finance	LTL 0043798-LTL 0043813
306	Email re: Attorney Privileged: Plato	LTL 0043958-LTL 0043959
307	Intentionally Omitted	Intentionally Omitted
308	Letter from J&J to PwC re: Review of J&J Consolidated Balance Sheet	LTL 0042869-LTL 0042873
309	Ovarian, Meso/Asbestos, Other Litigation Cost Chart	LTL 0042980
310	Email re: Attorney Privileged	LTL 0043778-LTL 0043781
311	Email re: Attorney Privileged	LTL 0044042-LTL 0044045
312	Email re: Attorney Privileged	LTL 0043818-LTL 0043819
313	Email re: Attorney Privileged	LTL 0043816-LTL 0043817
314	Email re: Attorney Privileged	LTL 0043885-LTL 0043887
315	Email and Meeting Invite re: Project Plato – Funding Agreement	LTL 0037528-LTL 0037530
316	Email and Meeting Invite re: DISCLOSURE SUB-COMMITTEE MEETING (October 2021) (adding conference room)	LTL 0030305-LTL 0030307
317	Email re: [EXTERNAL] Fwd: subcommittee request letter	LTL 0030375
318-324	Intentionally Omitted	Intentionally Omitted
325	Expert Report of Gregory K. Bell, Ph.D.	N/A
326	Charles River Associates Profile of Gregory K. Bell	N/A
327	J&J 2020 10-K	N/A
328	Litigation and Product Liability Update – PwC Discussion	LTL 0021775-LTL 0021782

In re LTL Management LLC

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
329	Tenth Amended Joint Ch. 11 Plan of Reorganization of Imerys Talc America, Inc. and its Debtor Affiliates Under Ch. 11 of the Bankruptcy Code (Dkt. 4099)	N/A
330	Disclosure Statement for Ninth Amended Joint Ch. 11 Plan of Reorganization of Imerys Talc America, Inc. and its Debtor Affiliates Under Ch. 11 of the Bankruptcy Code (Dkt. 2866)	N/A
331	Reuters Special Report: Inside J&J's Secret Plan to Cap Litigation Payouts to Cancer Victims	N/A
332	Expert Report of Saul E. Burian	N/A
333	DCF Model LTL 0030450	LTL 0030450-LTL 0030454
334	JJCI Income Statement from Period 1.2020 to 12.2020 (12.09.21)	LTL 0024251-LTL 0024251
335	Exhibit J-1 to Bell Report	N/A
336-340	Intentionally Omitted	Intentionally Omitted
341	Expert Report of Saul E. Burian	N/A
342	DI 956, Opposition to MTD	N/A
343	Reconciliation of non-GAAP Measures	N/A
344	Expert Report of Gregory K. Bell, Ph.D.	N/A
345	Expert Report of John Castellano	N/A
346	Nov. 5 2021 Hearing Transcript	N/A
347	In re Bestwall, 605 BR 43 (Bankr. W.D.N.C.)	N/A
348	Application For Retention of AlixPartners, LLP as Financial	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	Advisor Effective as of the Petition Date	
349	Exhibit A – Engagement Letter	N/A
350	Exhibit B – Certification of John R. Castellano in Support of Application for Retention of AlixPartners	N/A
351	Expert Report of John R. Castellano (01.28.2022)	N/A
352	Appendix 2 - List of Material Considered	N/A
353	Appendix 2 - List of Material Considered (Redline)	N/A
354	Exhibit 68 to Castellano Report – Confidential – Subject to Protective Order	N/A
355	In re SGL Carbon Corp., 200 F.3d 154 (1999)	N/A
356	Exhibit 35 to Castellano Report – Confidential – Subject to Protective Order	N/A
357	Adam Lisman Deposition Transcript Re: LTL Management LLC (2.8.2022)	N/A
358	Transfer pricing method determining intra-group debit and credit interest	LTL 0029924-LTL 0029928
359-375	Intentionally Omitted	Intentionally Omitted
376	Rule 702. Testimony by Expert Witnesses	N/A
377	Expert Report of Matthew Diaz (01.28.2022)	N/A
378	In re Bestwall, 605 BR 43 (Bankr. W.D.N.C.)	N/A
379	Expert Report of Matthew Diaz (10.20.2020)	N/A
380	JJCI Valuation	LTL 0030450-LTL 0030454
381	Debtor's Motion for Order Determining that U.S. Trustee's	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	Notice of "Reconstituted and Amended" Talc Claimants Committee is Invalid Reinstating that Committee (Dkt. 1047) and A&I's Mot. For Order Vacating Appointment of Second Official Committee of Talc Claimants and Addition of New Committee Members (Dkt. 1067)	
382	Volume 1 - Transcript of Proceedings Before the Honorable J. Craig Whitley (W.D.N.C.)	N/A
383	Limited Omnibus Objection of the MDL Plaintiffs' Steering Committee to the Debtor's First Day Motion (W.D.N.C.) (Dkt. 67)	N/A
383 (Kaplan Depo)	David Kaplan LinkedIn/Resume	
384	10/13/2020 JNJ Internal Conversation	SPGI0001078_0001- SPGI0001078_0002
385	10/27/2020 S&P Global Ratings Periodic Review of Johnson & Johnson	SPGI0000868_0001- SPGI0000868_0031
386	J&J – Internal Conversation (8.26.2021)	SPGI0001132_0001- SPGI0001132_0004
387	7/19/2021 Meeting Invite re JNJ/S&P Ratings - discuss media reports about cordoning off talc liabilities	SPGI0000006_0001
388	10/14/2021 Meeting Invite re Update Call with JNJ/S&P	SPGI0000705_0001
389	10/14/2021 Discussion on JNJ	SPGI0001110_0001- SPGI0001110_0003
390	10/14/2021 JNJ Internal Notes re filing bankruptcy for subsidiary with all talc liabilities	SPGI0000903_0001
391	Email Re: SPGConfidential – JNJ Bulletin	SPGI0000756_0001
392	Email re: J&J and S&P update	SPGI0000597_0001- SPGI0000598_0013

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
393	Johnson & Johnson - Committee 11-2021 (<i>Ex. used at Kaplan deposition</i>)	SPGI0001115_0001- SPGI0001115_0004
394	11/4/2021 S&P Global Ratings Committee Package re Johnson & Johnson	SPGI0001124_0001- SPGI0001124_0066
395	Email re: S&P Credit Rating Report	SPGI0000436_0001- SPGI0000437_0043
396	Johnson & Johnson's 'AAA' Rating Affirmed; Outlook Remains Negative	SPGI0001143_0001- SPGI0001143_0006
397	Email re S&P Ratings – request for an update on legal reserves & settlement expectation	SPGI0000507_0001- SPGI0000507_0005
398	Johnson & Johnson Form 10-K-Annual Report for FY 2020	N/A
399	Email re: Talc	SPGI0000080_0001- SPGI0000080_0005
400	8/26/2021 Email attaching “Talc: the next wave of asbestos litigation?”	SPGI0000080_0001- SPGI0000081_0002
401	10/27/2020 S&P Global Ratings Periodic Review of Johnson & Johnson	SPGI0000433_0001- SPGI0000433_0008
402	Arthur Wong LinkedIn/Resume	N/A
403	The Unpredictable Cost of Latent Catastrophes	N/A
404-497	Intentionally Omitted	Intentionally Omitted
TALC VICTIM DECLARATIONS		
498	Declaration of Rebecca J. Love, D.D.S.	N/A
499	Declaration of Kristie Doyle	N/A
EXPERT REPORTS		
500	Expert Report of Saul E. Burian	N/A
501.01-501.10	Materials Considered by Saul E. Burian	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
501.01	2.1 CapIQ Johnson & Johnson Presents at Barclays Global Consumer Staples Conference, Sep-10-2021	N/A
501.02	2.2 2022.01.27 SP 500 Dividend Rankings BBG Capture	N/A
501.03	2.3 CapIQ Consensus Estimate Screengrab	N/A
501.04	3.1 Barclays (2021.11.19)	N/A
501.05	3.2 Cantor Fitzgerald (2021.11.18)	N/A
501.06	3.3 Credit Suisse (2021.10.20)	N/A
501.07	3.3 Credit Suisse (2021.11.15)	N/A
501.08	3.4 Morgan Stanley (2021.11.12)	N/A
501.09	3.5 Societe Generale (2021.03.22)	N/A
501.10	3.6 Wells Fargo (2021.11.12) – Spin-off	N/A
502	Expert Report of Matthew Diaz	N/A
503.01-503.29	Materials Considered by Matthew Diaz	N/A
503.01	Anderson Judgment	N/A
503.02	Barden, Etheridge, McNeil, and Roning Judgments	N/A
503.03	Cabibi Judgment	N/A
503.04	Deyo Experience	N/A
503.05	Dividend Increase	N/A
503.06	Erik Haas Linked Bio	N/A
503.07	Fortune 500	N/A
503.08	Fox Judgment	N/A
503.09	Giannecchini Verdict	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
503.10	Ingham Opinion	N/A
503.11	JNJ_Johnson & Johnson Stock Price Quote – New York - Bloomberg	N/A
503.12	Johnson Judgment	N/A
503.13	Leavitt Judgment	N/A
503.14	LTL – The Deal Output	N/A
503.15	Michael Ullman Bio	N/A
503.16	Moody's November 2021 J&J Article	N/A
503.17	Moure-Cabrerra Judgment	N/A
503.18	Olson Judgment	N/A
503.19	Prudencio Judgment	N/A
503.20	Richard Dickinson LinkedIn	N/A
503.21	Ristesund Judgment	N/A
503.22	Robert Wuesthoff LinkedIn	N/A
503.23	S&P Lowers USA's Rating	N/A
503.24	S&P November 2021 J&J Article	N/A
503.25	S&P October 2020 J&J Article	N/A
503.26	S&P USA March 2021 Credit Rating	N/A
503.27	Schmitz Judgment	N/A
503.28	Slemp Judgment	N/A
503.29	World Bank Highest 2020 GDP	N/A
504	Expert Report of Gregory K. Bell, Ph.D. (1.28.22)	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
505	Expert Report of John R. Castellano (1.28.22)	N/A
506	Expert Report of Charles H. Mullin, Ph.D. (10.29.21)	N/A
ADDITIONAL DOCUMENTS		
507	Agreement for Transfer of Assets and Bill of Sale	LTL 0000557-LTL 0000564
508	Debtor's Response to Official Committee of Talc Claimants' RPD No. 40	N/A
509	Debtor's Supplemental Response to Official Committee of Talc Claimants' RPD No. 40	N/A
510	Email re: Project Plato Due Diligence Weekly Team Meeting	LTL 0036362
511	Re: Litigation follow-up	LTL 0030195-LTL0030197
512	J&J Organization Flow Chart	LTL 0030603
513	Email re: Privileged / Project Plato Talking Points	LTL 0029995; LTL 0029996-0029998
514	Declaration of John Kim in Support of First Day Pleadings, US Bankruptcy Court W District of North Carolina, 10/14/21, Case 21-30589 Doc #5	N/A
515	J&J Offered Talc Victims \$4 Billion to Settle Claims Monthly Before Unit's Bankruptcy – Bloomberg	N/A
516	LTL Response to Discovery in Respect of Motion to Dismiss	N/A
517	Johnson & Johnson's Responses & Objections to 30(b)(6) Notice (Bankr. D.N.J.) 1/28/2022	N/A
518	Debtor's Answers & Objections to First Set of Interrogatories by Official Committee of Talc Claimants 12/28/2021	N/A
519	Debtor's Responses & Objections to First Set of Requests for	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	Admission by Official Committee of Talc Claimants 12/31/2021	
520	Debtor's Responses & Objections to First Set of Interrogatories by Official Committee of Talc Claimants 12/31/2021	N/A
521	Debtor's Responses & Objections to Second Set of Interrogatories by Arnold & Itkin LLP 1/14/2022	N/A
522	Debtor's Responses & Objections to First Set of Interrogatories by Official Committee of Talc Claimants 1/21/2022	N/A
523	JJCI Balance Sheet for period ending Dec. 2019	LTL 0024246-LTL 0024247
524	JJCI Income Statement - GAAP	LTL 0024248-LTL 0024249
525	JJCI 2016 Federal Income Tax Return	LTL 0024200-LTL 0024245
526	JJCI 2017 Federal Income Tax Return	LTL 0024152-LTL 0024199
527	JJCI 2018 Federal Income Tax Return	LTL 0024104-LTL 0024151
528	JJCI 2019 Federal Income Tax Return	LTL 0024056-LTL 0024103
529	Ex. 10 to the Deposition of Adam Lisman taken in the PI Proceeding	N/A
530	9/16/2021 Michelle Mangum Letter to Gary Crossen	LTL 0000081-LTL 0000084
531	10/21/2020 Letter from Michelle Mangum to Gail Scott	LTL 0000097-LTL 0000100
532	2/2/2021 Letter from Michelle Mangum to Ellan Ahern	LTL 0020776-LTL 0020778
533	Declaration of John. K. Kim in Support of First Day Pleadings, (No. 21-30589), Dkt. 5 (10/14/21)	N/A
534-535	Intentionally Omitted	Intentionally Omitted
536	7/12/2020 Email re Q2 Legal Letters	LTL 0043774-LTL 0043776

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
537	10/14/2021 Email re J&J takes steps to equitably resolve all current and future talc claims	LTL 0043816-LTL 0043817
538	10/14/2021 Email re J&J takes steps to equitably resolve all current and future talc claims	LTL 0043818-LTL 0043819
539	9/24/2021 Email re Significant Subsidiary	LTL 0043822-LTL 0043823
540	9/13/2021 Email re Audit Committee Review	LTL 0043948
541	9/14/2021 Audit Committee Meeting September 2021	LTL 0043949-LTL 0043940
542	8/6/2021 Email re Introductions and Questions for call with Blackrock	LT 0044042-LT 0044045
543	8/9/2021 Email re Attorney Privileged	LT 0044046- LT 0044049
544	10/23/2020 Letter re Q3 2020 Management Representation Letter	LTL 0043772
545	10/23/2020 Letter re Q3 2020 Management Representation Letter - comparison to Q2 2020 (redline)	LTL 0043773
546	2/22/2021 Letter re Audit of Financial Statements	LTL 0030389- LTL 0030396
547	10/7/2021 Email re Plato Legal Entity Step Plan and Project Plato Presentation	LTL 0030216- LTL 0030217
548	7/1/2021 Meeting Invite re Canceled 7/6 Plato Discussion	LTL 0038238
549	Project Plato Due Diligence Clean Team Letter & Acknowledgment 7/12/2021	LTL 0029880- LTL 0029882
550	7/19/2021 Email re Acknowledged & Agreed: Project Plato Clean Team Letter	LTL 0036184
551	7/29/2021 Letter re review of consolidated balance sheet	LTL 0030353- LTL 0030357
552	8/6/2021 Email re Introductions and Questions for call with Blackrock	LTL 0043778- LTL 0043781

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
553	9/13/2021 Email attaching Notes for Audit Committee Review	LTL 0030288- LTL 0030290
554	Johnson & Johnson Retention Bonus Agreement to Robert Wuesthoff	LTL 0030620- LTL 0030623
555	Expert Report of Charles H. Mullen (<i>In re Imerys Talc Am., Inc.</i> , No. 19-10289 Bankr. D. Del.) (2/10/22 version)	LTL 0044073-LTL 0044225
556	Spreadsheet of Johnson & Johnson Policy Summary Sorted by Start Date (1958-1985)	LTL 0003087-LTL 0003102
557	Johnson & Johnson Transfer pricing method determining intra-group debit and credit interest	LTL 0029924-LTL 0029928
558	Compilation Exhibit reflecting verdicts in talc litigation	N/A
559	First Day Dec. of Alexandra Picard, <i>In re Imerys Talc America, Inc., et al.</i> (Bankr. Del. 19-10289), Doc. No. 10	N/A
560	J&J's Response and Reservation of Rights to (A) NJ Action Insurers' Mot. re Automatic Stay Does Not Apply, and (B) Travelers' joinder thereto, <i>In re: Imerys Talc America</i> (Bankr. Del. 19-10289), Doc. No. 3044	N/A
561	TCC and FCR Motion for TRO and Preliminary Injunction, <i>Imerys Talc v. Johnson & Johnson</i> , (Bankr. Del. Adv. Pro. 21-51006), Doc. No. 4	N/A
562	TCC and FCR Memo. of Law ISO Motion for TRO and Preliminary Injunction, <i>Imerys Talc v. Johnson & Johnson</i> , (Bankr. Del. Adv. Pro. 21-51006), Doc. No. 5	N/A
563	J&J Objection to TCC and FCR Motion for Preliminary Injunction, <i>Imerys Talc v. Johnson & Johnson</i> , (Bankr. Del. Adv.	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	Pro. 21-51006), Doc. No. 33 (unsealed)	
564	Bench Ruling Granting Motion to Intervene & Denying Motion for Preliminary Injunction, <i>In re: Imerys Talc America</i> (Bankr. Del. 19-10289), Doc. No. 3975	N/A
565	J&J Executive Committee	N/A
566	Amendment to Lactaid Agreements	LTL 0031559-LTL 0031561
567	Amendment Two to Lactaid Agreements	LTL 0031562-LTL 0031565
568	Third Amendment to License and Supply Agreements ("Lactaid Agreements")	LTL 0031566-LTL 0031569
569	Fourth Amendment to License and Supply Agreements	LTL 0031570-LTL 0031575
570	Fifth Amendment to License and Supply Agreements	LTL 0031576-LTL 0031595
571	Amended and Restated License and Supply Agreement	LTL 0031596-LTL 0031651
572	License and Supply Agreement	LTL 0031652-LTL 0031707
573	McNeil Correspondence	LTL 0031708-LTL 0031722
574	License and Supply Agreement	LTL 0031723-LTL 0031778
575	Letter Agreement	LTL 0031779
576	Trademark Assignment Agreement	LTL 0031780-LTL 0031783
577	IP License Agreement	LTL 0031784-LTL 0031950
578	IP License Agreement – Amendment #1	LTL 0031951-LTL 0031955
579	IP License Agreement – Amendment #2	LTL 0031956-LTL 0031965
580	Amended and Restated License Agreement	LTL 0031966-LTL 0032001
581	Amendment No. 1 to The Amended and Restated License Agreement	LTL 0032002-LTL 0032006

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
582	Facsimile re: Stock and Asset Purchase Agreement between Pfizer, Inc., and J&J	LTL 0032007
583	Sales and Product Handling Agreement	LTL 0032008-LTL 0032087
584	First Amendment to Sales and Product Handling Agreement	LTL 0032088-LTL 0032090
585	How J&J tried to worm its way out of paying \$3.5BN to victims of cancer causing baby talc – Daily Mail	N/A
586-599	Intentionally Omitted	Intentionally Omitted
NORTH CAROLINA PRELIMINARY HEARING EXHIBITS		
600.001-600.088	Debtor's Exhibit List from Preliminary Hearing in North Carolina	N/A
600.001	2021 Corporate Restructuring documents, closing binder and all documents therein	LTL 0001058-LTL 0003086
600.002	Agreement for Transfer of Assets and Bill of Sale, dated January 1, 1979, between Johnson & Johnson and Johnson & Johnson Baby Products Company	LTL 0000557-LTL 0000564
600.003	Agreement for Transfer of Assets and Bill of Sale, dated January 1, 1979, between Johnson & Johnson and Johnson & Johnson Baby Products Company	LTL 0000565-LTL 0000609
600.004	Funding Agreement between Johnson & Johnson, Johnson & Johnson Consumer Inc., and LTL Management LLC, dated October 12, 2021	LTL 0002300
600.005	Merger Support Agreement Johnson & Johnson Consumer Inc., and LTL Management LLC, dated October 12, 2021	LTL 0002321
600.006	December 12, 1978 Board of Directors Meeting Minutes	LTL 0000021

In re LTL Management LLC
Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
600.007	LTL Management LLC's Minutes of Board of Managers and Resolutions, dated October 14, 2021	LTL 0019184
600.008	FRE 1006 Insurance Coverage Evidence Summary	LTL 0023515
600.009	Johnson & Johnson Insurance Coverage Chart	LTL 0003087
600.010	Insurance Agreement: Aetna #38 AL 12880 SR(Y) 1-1-1967 to 1-1-1970	LTL 0000168
600.011	Insurance Agreement: Aetna 38 XN 07 SCA	LTL 0000317
600.012	Insurance Agreement: Home HEC 4764031	LTL 0000387
600.013	Insurance Agreement: North River JU 0802	LTL 0000410
600.014	Insurance Agreement: Aetna Primary 38 PK 15 SCA	LTL 0000511
600.015	1989 Agreement with Safeway for indemnification	LTL 0019160
600.016	2020 Agreement with HEB for indemnification	LTL 0022538
600.017	FRE 1006 Tender Agreement Evidence Summary	LTL 0023527
600.018	Tender Agreement wherein Johnson & Johnson Consumer Inc. agrees to tender defense and indemnify Safeway for claims by Abbott, Richard, dated May 13, 2019	LTL 0012853
600.019	Tender Agreement wherein Johnson & Johnson Consumer Inc. agrees to tender defense and indemnify Albertson for claims by Lane, Ardys, dated October 8, 2018	LTL 0013141
600.020	MDL Second Amended Master Complaint, MDL NO. 16-2738 (D.N.J. Dec. 22, 2020)	LTL 0012521
600.021	Cadagin, et al v. Johnson & Johnson, et al., No. 18-L-572 In	LTL 0018560-LTL 0018713

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	the Circuit Court of the Twentieth Judicial Circuit St. Clair County, Illinois, (Jul. 28, 2021 Trial Transcript and Verdict form)	
600.022	Anderson et al. v. Borg Warner Corp. et al., No. BC666513, in the Superior Court for the State of California, County of Los Angeles (Jun. 27, 2017)	LTL 0017642
600.023	Barden v. Johnson & Johnson, et al., MID-L-1809-17AS, Superior Court of New Jersey, Middlesex County (Feb. 6, 2021 Trial Transcript)	LTL 0017692
600.024	Prudencio v. Johnson & Johnson, No. RG20061303, in the Superior Court of California, Alameda County (Aug. 13, 2021 Trial Transcript)	LTL 0017890
600.025	Vanklive v. Johnson & Johnson, No. RC20062734, Superior Court of California, County of Alameda (Oct. 22, 2021 Trial Transcript & Oct. 26, 2021 Trial Transcript)	LTL 0018460-LTL 0018473
600.026	McBride et al. v American International Industries, Inc., et al., No. 49D13-2110-MI-034781, Marion County Superior Court for the State of Indiana (Oct. 15, 2021)	LTL 0018439
600.027	McBrayer, et al. v. Acme et al., No. 2020-CP10-03946, County of Charleston for the State of South Carolina (October 28, 2021 Trial Transcript)	LTL 0021919
600.028	Transcript of July 30, 2019 proceeding in Hayes v. Colgate Palmolive Co., Case No. 16-CI-03503 (Ky. Cir. Ct. Jefferson Jul. 30, 2019), Testimony of Dr. John Hopkins	LTL 0022023

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
600.029	Settlement Facility Agreement by and among Johnson & Johnson, Johnson & Johnson Consumer Inc., LTL Management LLC, and U.S. Bank National Association, as the Trustee, Funding Agreement Documents (Dkt. 8 – 1, Ex. A)	N/A
600.030	Reliance materials of expert Charles H. Mullin PhD	LTL 0021298- LTL 0021762
600.031	Expert report of Charles H. Mullin PhD	N/A
600.032	List of Protected Parties (Adv. Pro. Dkt. 1 -1, Appendix B; Adv. Pro. Dkt. 2-1, Appendix B)	N/A
600.033	Agreement between Cyprus Mines Corporation and Johnson & Johnson, dated Jan. 6, 1989	LTL 0023277
600.034	Plan and Agreement of Reorganization between Eastern Magnesia Talc Co., Inc., and Johnson & Johnson, dated July 30, 1965.	LTL 0023255
600.035	Acquisition of the assets and Liabilities of Eastern Magnesia Talc Co., Inc. by a Wholly-Owned Subsidiary of Johnson & Johnson, dated July 30, 1965	LTL 0023253
600.036	Asset Purchase Agreement between Johnson & Johnson Consumer Companies, Inc. and Pharma Teach Industries, Inc., dated Apr. 4, 2005 – Confidential	LTL 0000610
600.037	Manufacturing and Supply Agreement between Johnson & Johnson Consumer Companies, Inc. and Pharma Teach Industries, Inc., dated Aug. 29, 2005 – Confidential	LTL 0000736
600.038	2008 Amendment to Manufacturing and Supply Agreement between Johnson &	LTL 0000811

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	Johnson Consumer Companies, Inc. and Pharma Teach Industries, Inc., dated Aug. 29, 2005 – Confidential	
600.039	2013 Amendment to Manufacturing and Supply Agreement between Johnson & Johnson Consumer Companies, Inc. and PTI Royston, LLC, dated Aug. 29, 2005 – Confidential	LTL 0000817
600.040	2017 Amended and Restated Supply Agreement between Johnson & Johnson Consumer Companies, Inc. and PTI Royston, LLC, dated Aug. 29, 2005 – Confidential	LTL 0000842
600.041	Indemnification agreement between Bausch Health Companies (f/k/a Valeant Pharmaceuticals International, Inc.) and Johnson & Johnson Consumer, Inc., dated Sept. 9, 2012	LTL 0001050
600.042	2020 Johnson & Johnson Annual Report	LTL 0017485
600.043	Johnson & Johnson Medical Safety Counsel Charter, dated April 19, 2013	LTL 0021817
600.044	Johnson & Johnson Medical Safety Counsel Charter, dated April 10, 2014	LTL 0021827
600.045	Johnson & Johnson Medical Safety Counsel Charter, dated July 27, 2015	LTL 0021838
600.046	Consumer Medical Safety Counsel Operational Charter, dated June 26, 2017	LTL 0021848
600.047	Consumer Medical Safety Counsel Operational Charter, dated June 28, 2018	LTL 0021859

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
600.048	Consumer Medical Safety Counsel Operational Charter, dated March 6, 2019	LTL 0021870
600.049	Declaration of Susan Schirger-Ward	
600.050	Declaration of Adam Lisman	
600.051	Letter from A.J. Huetteman to A. Marinaro, dated October 31, 1977	LTL 0012488
600.052	Johnson & Johnson Baby Products Company Action Authorized by Unanimous Consent of Shareholder, dated July 21, 1981, attaching Agreement for Transfer of Assets and Bill of Sale, dated July 27, 1981, between Johnson & Johnson Baby Products Company and Omni Education Corporation	LTL 0012489
600.053	Certificate of Merger of Personal Products Company into Johnson & Johnson Baby Products Company, dated July 27, 1981	LTL 0012497
600.054	Agreement for Transfer of Assets and Bill of Sale, dated January 3, 1988, between Johnson & Johnson Baby Products Company (renamed Johnson & Johnson Orthopaedics) and Johnson & Johnson Dental Products (renamed Johnson & Johnson Consumer Products, Inc.)	LTL 0012508
600.055	Johnson & Johnson Consumer Companies, Inc. Certificate of Incorporation, dated July 1, 1997	LTL 0012513
600.056	Incorporation of Personal Products, dated October 9, 1970	LTL 0019433
600.057	Certificate of Merger between McNeil Consumer Products Company and Personal Products Company, dated November 28, 1988	LTL 0019498

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
600.058	Certificate of Merger, dated June 25, 2015, between Neutrogena, LLC, Johnson & Johnson Consumer Companies LLC, Johnson & Johnson Sales and Logistics Company, LLC, and McNEIL-PPC, Inc.	LTL 0019427
600.059	Certificate of Merger between Johnson & Johnson Consumer Companies, LLC and Johnson & Johnson Consumer Companies, Inc., dated June 25, 2015	LTL 0012706
600.060	Asset Purchase Agreement among Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated September 9, 2012	LTL 0000954
600.061	Agreement and Plan of Merger dated, dated June 25, 2015, between Neutrogena, LLC, Johnson & Johnson Consumer Companies LLC, Johnson & Johnson Sales and Logistics Company, LLC, and McNEIL-PPC, Inc.	LTL 0012710
600.062	Johnson & Johnson Consumer Inc. Talc 2021 Accounting Entry Sample – Confidential	LTL 0019833
600.063	Talc 2007-2021 Other Income & Expense Details – Confidential	LTL 0019178
600.064	Johnson & Johnson Worldwide Financial Procedures, 330Ba - Legal Fees, last revised March 2005	LTL 0021763
600.065	Johnson & Johnson 10-K, dated January 2, 1977	LTL 0023352
600.066	Johnson & Johnson 10-K, dated December 30, 1979	JNJALC000685927
600.067	1986 Johnson & Johnson Annual Report	JNJALC000648718
600.068	Johnson & Johnson 10-K, dated January 1, 1978	LTL 0019191

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
600.069	Johnson & Johnson 10-K, dated December 31, 1978	LTL 0019235
600.070	Excerpt from 1985 Annual Report	LTL 0019296
600.071	Excerpt from 1986 Annual Report	LTL 0019297
600.072	Excerpt from 1989 Annual Report	LTL 0019298
600.073	Agreement between Johnson & Johnson Consumer Companies, Inc. and PTI Royston, LCC regarding Talc Sanitization Project, dated March 15, 2011	LTL 0019380
600.074	Asset Purchase Agreement between Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated Sept. 9, 2012	LTL 0019502
600.075	Disclosure Schedule to Asset Purchase Agreement between Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated Sept. 9, 2012	LTL 0019598
600.076	Executive Committee Actions, Dated July 18 to September 11, 1986	LTL 0019687
600.077	Figure 1 from the Expert Report of Dr. Charles Mullin of October 29, 2021	N/A
600.078	Figure 2 from the Expert Report of Dr. Charles Mullin of October 29, 2021	N/A
600.079	Figure 3 from the Expert Report of Dr. Charles Mullin of October 29, 2021	N/A
600.080	Trial outcome chart	LTL 0023514
600.081	Johnson & Johnson Medical Safety Standard	LTL 0021881
600.82	Intentionally Omitted	Intentionally Omitted

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
600.083	Notice of Bankruptcy Filing in Hill v. J&J et al., dated Oct. 26, 2021	N/A
600.084-600.085	Intentionally Omitted	Intentionally Omitted
600.086	Richards v. Johnson & Johnson et al. Complaint	N/A
600.087	Plant Inspection Report	N/A
600.088	Years of Exposure & Compensation Table	N/A
601.001-601.206	Joint Claimants' Exhibit List from Preliminary Hearing in North Carolina	N/A
601.001	Barden et al. v. Brenntag et al. Transcript 7/22/2019	N/A
601.002	Herford v. AT&T Corp. et al. Transcript 10/30/2017	N/A
601.003	John Hopkins Deposition Transcript 4/11/2018	N/A
601.004	John Hopkins Deposition Transcript 1/28/2019	N/A
601.005	In re LTL Management – TRO Hearing Transcript 10/22/2021	N/A
601.006	Olson v. J&J et al. Transcript 5/3/2019	N/A
601.007	Marc Monsaeu 2/24/2004 Fax and Lab Test Sheet	JNJI4T5 000004097
601.008	3/16/1998 Letter to John C. O'Shaughnessy	N/A
601.009	J&J JBP Advertisement (1980)	N/A
601.010	John McKeegan 6/4/2000 Email and AP Story	N/A
601.011	John McKeegan Deposition Transcript 6/14/2021	N/A
601.012	J&J "What We Know" Advertisement Review Email 12/17/2018	N/A
601.013	J&J Letter to U.S. House Subcommittee 3/11/2019	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.014	J&J CEO Alex Gorsky Twitter Video December 20183	N/A
601.015	CNN "Mad Money" Screenshot Featuring J&J CEO Alex Gorsky	N/A
601.016	Olson v.J&J et al. Transcript 5/21/2019	N/A
601.017	Leavitt Jury Verdict Sheets 3/13/2019	N/A
601.018	Prudencio Jury Verdict Sheets 8/19/2021	N/A
601.019	Barden et al. Jury Verdict Sheets 9/11/2019	N/A
601.020	Olson v. J&J et al. Transcript 5/31/2019	N/A
601.021	Olson v. J&J et al. Punitive Damages Bonds	N/A
601.022	J&J Shower to Shower Formulation Letter 10/4/1976	N/A
601.023	Shower to Shower Respirable Particles Study Letter 6/3/1976	N/A
601.024	J&J Kolmar Talc Delivery Letter 1/27/1970	JNJ 000236171
601.025	Kolmar Labs J&J Formulation Spec Sheet 2/15/1967	N/A
601.026	McNeill-George v. Brenntag, et al. J&J Interrogatory Responses Filed 5/13/2019	N/A
601.027	Etheridge v. Brenntag et al. J&J 8/27/2019 Memorandum re: JJCI	N/A
601.028	Barden et al. v. Brenntag et al. Transcript 8/19/2019	N/A
601.029	Barden et al. v. Brenntag et al. Transcript 9/3/2019	N/A
601.030	French Affidavit – Dickens 6/20/2018	N/A
601.031	French Affidavit – Smith 9/10/2018	N/A
601.032	French Affidavit – English 4/17/2019	N/A
601.033	French Affidavit – Holleman 4/17/2019	N/A

In re LTL Management LLC
Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.034	Intentionally Omitted	Intentionally Omitted
601.035	LTL Management Interrogatory Responses	N/A
601.036	J&J 1979 Form 10-K	N/A
601.037	J&J 1978 Form 10-K	LTL 0019191- LTL 0019234
601.038- 601.039	Intentionally Omitted	Intentionally Omitted
601.040	JJBPC Shareholder Meeting and APA re: Omni Transfer 7/21/1981	JNJ TALC000533370
601.041	JJBPC and J&J Dental APA 1/3/1988	JNJ TALC000533381
601.042	J&J 1978 Annual Report	N/A
601.043	Personal Products Co. Memo re: Shower to Shower 9/21/1978	N/A
601.044	J&J 1979 Annual Report	N/A
601.045	J&J 1980 Annual Report	N/A
601.046	J&J 1981 Form 10-K	N/A
601.047	Personal Products Co. Shower to Shower Spec Sheet 1/3/1978	JNJ 000058735
601.048	Personal Products Co. Shower to Shower clinical Test 7/29/1981	N/A
601.049	J&J Executive Committee Actions 7/18/1986–9/11/1986	LTL 19687
601.050	J&J & Cyprus Mines Agreement 1/6/1989	N/A
601.051	Kevin Neat Deposition Transcript 8/6/2021	N/A
601.052	Herford v. AT&T Corp. et al. J&J Interrogatory Responses Filed 5/10/2017	N/A
601.053	Kerkhof et al. v. Brenntag et al. J&J Interrogatory Responses	N/A
601.054	Von Salzen v. Am. Inter. Indus. et al. J&J Interrogatory Responses Filed 4/2/2018	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.055	Lopez v. Brenntag et al. J&J Interrogatory Responses Filed 9/20/2018	N/A
601.056	North River & Lloyd's Insurance Letter re: Talc Claims 5/31/2018	LTL 0012180- LTL 0012210
601.057-601.063	Intentionally Omitted	Intentionally Omitted
601.064	Westport Insurance Letter 8/6/2020	LTL 0012483- LTL 0012487
601.065	Travelers Insurance Letter 4/22/2021	LTL 0012477- LTL 0012482
601.066	Travelers Insurance Letter 9/19/2020	LTL 0012475- LTL 0012476
601.067	Travelers Insurance Letter 10/8/2020	LTL 0012471- LTL 0012474
601.068	Travelers Insurance Letter 10/2/2020	LTL 0012469- LTL 0012470
601.069	Travelers Insurance Letter 9/21/2020	LTL 0012462- LTL 0012468
601.070	Travelers Insurance Letter 9/3/2020	LTL 0012453- LTL 0012455
601.071	Travelers Insurance Letter 8/27/2020	LTL 0012450- LTL 0012452
601.072	Travelers Insurance Letter 8/24/2020	LTL 0012447- LTL 0012449
601.073	Travelers Insurance Letter 8/12/2020	LTL 0012444- LTL 0012446
601.074	Travelers Insurance Letter 8/4/2020	LTL 0012439- LTL 0012443
601.075	Travelers Insurance Letter 7/29/2020	LTL 0012432- LTL 0012438
601.076	Travelers Insurance Letter 9/4/2019	LTL 0012424- LTL 0012427
601.077	Travelers Insurance Letter 5/10/2019	LTL 0012420- LTL 0012443
601.078	Travelers Insurance Letter 4/8/2019	LTL 0012416- LTL 0012419
601.079	Travelers Insurance Letter 3/22/2019	LTL 0012411- LTL 0012415
601.080	Travelers Insurance Letter 3/1/2019	LTL 0012409- LTL 0012410

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.081	Travelers Insurance Letter 1/7/2019	LTL 0012404- LTL 0012408
601.082	Travelers Insurance Letter 4/2/2018	LTL 0012326- LTL 0012326
601.083	Safety National Insurance Letter 8/10/2020	LTL 0012313- LTL 0012315
601.084	Multiple Insurance Policies Letter 10/18/2021	LTL 0012310- LTL 0012312
601.085	Multiple Insurance Policies Letter 9/21/2021	LTL 0012307- LTL 0012309
601.086	Multiple Insurance Policies Letter 8/3/2021	LTL 0012304- LTL 0012306
601.087	Multiple Insurance Policies Letter 6/22/2021	LTL 0012301- LTL 0012303
601.088	Multiple Insurance Policies Letter 5/25/2021	LTL 0012298- LTL 0012300
601.089	Multiple Insurance Policies Letter 4/20/2021	LTL 0012293- LTL 0012295
601.090	Multiple Insurance Policies Letter 3/22/2021	LTL 0012290- LTL 0012292
601.091	Multiple Insurance Policies Letter 2/22/2021	LTL 0012285- LTL 0012287
601.092	Multiple Insurance Policies Letter 10/19/2020	LTL 0012270- LTL 0012272
601.093	Multiple Insurance Policies Letter 9/22/2020	LTL 0012267- LTL 0012269
601.094	Multiple Insurance Policies Letter 8/19/2020	LTL 0012264- LTL 0012266
601.095	Multiple Insurance Policies Letter 7/15/2020	LTL 0012261- LTL 0012263
601.096	Multiple Insurance Policies Letter 6/22/2020	LTL 0012258- LTL 0012260
601.097	Multiple Insurance Policies Letter 4/1/2020	LTL 0012240- LTL 0012242
601.098	Multiple Insurance Policies Letter 8/28/2019	LTL 0012225- LTL 0012227
601.099	Multiple Insurance Policies Letter 8/28/2019	LTL 0012222- LTL 0012224
601.100	Multiple Insurance Policies Letter 6/20/2019	LTL 0012219- LTL 0012221
601.101	Multiple Insurance Policies Letter 3/20/2019	LTL 0012214- LTL 0012216

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.102	Multiple Insurance Policies Letter 1/10/2019	LTL 0012211- LTL 0012213
601.103-601.124	Intentionally Omitted	Intentionally Omitted
601.125	Fox Verdict Sheet	N/A
601.126	Ristesund Verdict Sheet	N/A
601.127	Slemp Verdict Sheet	N/A
601.128	Ingham, et al. v. Johnson & Johnson, Decision by Missouri Court of Appeals, June 23, 2020	N/A
601.129	J&J's Motion for Entry of Order Modifying Automatic Stay filed in In re Imerys Talc America, Inc., Case No. 19-10289 (LSS), Doc. 1567 (Bankr. Del. March 20, 2020)	N/A
601.130	Stipulation regarding value of J&J and JJCI filed in Kleiner v. Johnson & Johnson and Johnson & Johnson Consumer Inc. in the Court of Common Pleas, Philadelphia County on August 11, 2021	N/A
601.131	J&J Form 10-Q, dated July 4, 2021, pgs. 1 and 31	N/A
601.132	J&J Form 8-K, dated October 19, 2021	N/A
601.133	Email dated October 26, 2021 from Susan Sharko to Judge Schneider regarding stay of MDL	N/A
601.134	J&J's Reply Brief to PSC's Memorandum of Law regarding Stay of MDL, Doc. 26052, filed on October 26, 2021	N/A
601.135	Email dated October 27, 2021 from Wayne Fang forwarding correspondence from Chief Judge Wolfson	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.136	J&J's Omnibus Reply in Support of J&J's Motion for Entry of Order Modifying Automatic Stay filed in In re Imerys Talc America, Inc., Case No. 19-10289 (LSS), Doc. 1769 (Bankr. Del. May 28, 2020)	N/A
601.137	Email dated December 5, 2020 from Lorena Telofski, FW: Talc – Not For Further Distribution	JNJ 000563635
601.138	Debtor's Answers and Objections to Plaintiffs' Steering Committee First Set of Interrogatories, Executed October 28, 2021	N/A
601.139	Plaintiffs' Second Amended Master Long Form Complaint and Jury Demand, MDL No. 16-2738 (FLW) (LHG), Doc. 16132-2, Filed December 22, 2020	N/A
601.140	Indemnification and Defense Agreement (Publix), Dated December 22, 2016 (LTL 0019834)	N/A
601.141	Letter Dated April 10, 2017, re: Walgreen Co. defense and indemnity, sent to Richard Gering from Deborah Moeller (LTL 0020917)	N/A
601.142	Letter Dated April 10, 2017, re: Walgreen Co. defense and indemnity, sent to Richard Gering from Deborah Moeller (LTL 0020766)	N/A
601.143	JJCI and J&J October 2021 Supplemental Responses to Plaintiffs' First Set of Interrogatories, MDL No. 16-2738 (FLW) (LHG)	N/A
601.144	J&J 1977 Annual Report	JNJTALC 000648170
601.145	J&J 1981 Annual Report	JNJTALC 000648397

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.146	J&J 1982 Annual Report	JNJTALC 000648456
601.147	J&J 1983 Annual Report	JNJTALC 000648518
601.148	J&J 1984 Annual Report	JNJTALC 000648582
601.149	J&J 1985 Annual Report	JNJTALC 000648650
601.150	J&J 1986 Annual Report	JNJTALC 000648718
601.151	Photos: Johnson's Baby Powder (tin container)	N/A
601.152	Photo: 1985 Bottle, Trial Bottles	N/A
601.153	Photo: Johnson & Johnson Foot and Body Powder (back of bottle)	N/A
601.154	Photos: Shower to Shower	N/A
601.155	Moure-Cabrera Transcript of Jury Instructions	N/A
601.156	Moure-Cabrera Verdict Sheet	N/A
601.157	PSC's Second Amended Notice of 30(b)(6) Deposition of Johnson and Johnson (Tina French Deposition Exhibit 1)	N/A
601.158	Tina French, Deposition Transcript Designation, August 15, 2018	N/A
601.159	John Hopkins, Barden v. Brenntag et al, Trial Transcript Designation, July 22, 2019	N/A
601.160	Joanne Waldstreicher, M.D., Deposition Transcript Designation, September 14, 2018	N/A
601.161	Plaintiffs' First Amended Master Long Form Complaint and Jury Demand, MDL No. 16-2738 (FLW) (LHG), Doc. 132, Filed March 16, 2017	N/A
601.162	J&J Medical Safety Council - JJMSC Charter - 8/9/2013	LTL 0021817

In re LTL Management LLC

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.163	J&J Medical Safety Council - JJMSC Charter - 6/13/2014	LTL 0021827
601.164	J&J Medical Safety Council - JJMSC Charter - 9/15/2015	LTL 0021838
601.165	Consumer Medical Safety Council (MSC) Operational Charter - 6/26/2017	LTL 0021848
601.166	Consumer Medical Safety Council (MSC) Operational Charter - 6/28/2018	LTL 0021859
601.167	Consumer Medical Safety Council (MSC) Operational Charter - 3/6/2019	LTL 0021870
601.168	What you need to know about the new JJ Medical Safety Standard	JNJALC000413044
601.169	J&J Medical Safety & Innovation: Commitment to a Patient & Consumer - Centered Approach	JNJ000463760
601.170	Project Fortis 2016 September	JNJ000547079
601.171	Office of Consumer Medical Safety (OCMS)	JNJALC001383292
601.172	Declaration of Melanie L. Cyganowski, October 29, 2021	N/A
601.173	2018 Draft Screening Assessment on Talc - Health Canada	JNJALC001094046
601.174	2021 Final Screening Assessment on Talc - Health Canada	JNJALC001494350
601.175-601.200	Intentionally Omitted	Intentionally Omitted
601.201	Schmitz Jury Verdict Sheets	N/A
601.202	Leavitt Jury Verdict Sheets	N/A
601.203	Prudencio Jury Verdict Sheets	N/A
601.204	LTL Management - Witness Disclosure Letter 10/27/2021	N/A
601.205	LTL Management - Schirger-Ward Deposition Transcript 10/31/2021	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
601.206	LTL Management - Lisman Deposition Transcript 10/30/2021	N/A
602.001-602.016	Exhibits to Debtor's Memorandum of Law (Dkt. 128)	N/A
602.001	J&J's 1981 Annual Report	N/A
602.002	Excerpts from Dr. Joanne Waldstreicher's sworn deposition testimony in (i) Ingham v. Johnson & Johnson, No. 1522-CC10417, on April 19, 2018, in the Circuit Court of the City of St. Louis in the State of Missouri, and (ii) Leavitt v. Johnson & Johnson, No. RG-17-882401, on September 14, 2018, in the Superior Court of California, County of Alameda	N/A
602.003	Excerpts from Dr. Susan Nicholson's sworn deposition testimony in Prudencio v. Johnson & Johnson, No. RG20061303, on June 4, 2021 in the Superior Court of California, County of Alameda	N/A
602.004	September 17, 1965 document entitled Amendment to the Articles of Incorporation of Docrom, Inc.	N/A
602.005	July 30, 1965 Plan and Agreement of Reorganization between J&J and Eastern Magnesia Talc Co., Inc.	N/A
602.006	October 2, 1967 Amendment of the Articles of Association of the Eastern Magnesia Talc Co., Inc.	N/A
602.007	October 29, 1983 deposition transcript of Roger Miller in Westfall v. Whitaker, Clark, & Daniels et al., CA79-0269 (D.R.I. 1982)	N/A
602.008	April 9, 1965 letter to the shareholders reflecting Emil Eskilsen as President	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
602.009	April 5, 1967 State of Vermont Annual Report of Eastern Magnesia Talc Co., Inc., which lists Emil Eskilsen as President	N/A
602.010	November 28, 1967 Windsor Minerals Inc. Board Minutes	N/A
602.011	January 14, 1975 letter regarding a January 1, 1975 Windsor Minerals ore/asbestos study	N/A
602.012	December 8, 1978 memo regarding Asbestiform Mineral Analysis and the Sampling Procedure for Hammondsville Cosmetic Ore	N/A
602.013	June 26, 1979 talc specification from J&J subsidiaries	N/A
602.014	January 6, 1989 Stock Purchase Agreement between J&J and Cyprus Mines Corp.	N/A
602.015	1989 Supply Agreement between Windsor and J&J Baby Products	N/A
602.016	Accounting records from the Personal Product Company for the year ended December 31, 1978	N/A
603.001-603.025	Exhibits to TCC Objection (AP Dkt. 142)	N/A
603.001	Transcript of deposition of John K. Kim taken on October 31, 2021 in this Adversary Proceeding (pages 245:11 to 248:5 redacted pursuant to parties' confidentiality agreement)	N/A
603.002	Brochure titled "What you want to know about JOHNSON'S Baby Powder," copyright Johnson & Johnson, 1976	JNJ 00088189_0001-JNJ 00088189_0005
603.003	Document titled "Johnson & Johnson Baby Powder Questions and Answers" marked Confidential, December 1985	JNJ 000018966-JNJ 000019024
603.004	Johnson & Johnson memorandum dated September 30, 1970,	JNJ 000234904-JNJ 000234905

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	subject: Talc Activities Here and at Colorado School of Mines to Dr. T. H. Shelley, signed by W. Ashton	
603.005	Transcript of deposition of Danielle Devine taken on January 19, 2021 in Pulido v. Johnson and Johnson	N/A
603.006	Transcript of deposition of Christopher Picariello taken on January 11, 2019 in McElroy v. Johnson & Johnson	N/A
603.007	(a) a chain of emails from Jay Bhimani, dated November 12 and 16, 2021, attaching Order Granting Debtor's Request for Preliminary Injunctive Relief filed in this Adversary Proceeding [Dkt. No. 102], and (b) a Notice Bankruptcy Filing and Stay of Proceedings, in Reyes v. Johnson and Johnson	N/A
603.008	Transcript of proceedings held on October 6, 2021 in Johnson v. Johnson and Johnson in the Superior Court for the State of California, County of Los Angeles, Case No. JCCP 4674/20STCV17335	N/A
603.009	Transcript of proceedings held on October 12, 2021 in Johnson v. Johnson and Johnson in the Superior Court for the State of California, County of Los Angeles, Case No. JCCP 4674/20STCV17335	N/A
603.010	Entry of Judgment dated October 15, 2021 in Johnson v. Johnson and Johnson in the Superior Court for the State of California, County of Los Angeles, Case No. JCCP 4674/20STCV17335	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
603.011	Approval Request - Memorandum of Approval dated October 11, 2021, subject: Approval Request for the Restructuring of Johnson & Johnson Consumer Inc.	LTL 0021791-LTL 0021801
603.012	Transcript of Hearing of Preliminary Injunction on November 4, 2021 in this Adversary Proceeding	N/A
603.013	Transcript of PI Hearing on November 5, 2021 in this Adversary Proceeding	N/A
603.014	Transfer Order [MDL Dkt. No. 1] dated October 4, 2016 filed in In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation, 3:16-md-02738-FLW-LHG	N/A
603.015	Transcript of status conference held on July 21, 2021 in MDL, United States District Court, District of New Jersey [MDL Dkt. No. 24441]	N/A
603.016	Brief for Defendants-Appellants [NYSCEF Doc. No. 50] dated August 6, 2021 in Olson v. Brenntag N. Am. Inc.	N/A
603.017	Memorandum of Law in Support of J&J's and Johnson & Johnson Consumer Inc.'s Motion to Fix Venue for Claims Related to Imery's Bankruptcy filed on April 18, 2019 in In re Imerys Talc America, Inc., et al., Civ. Action No. 19-mc-00103 (MN) (D. Del. 2019) [Imerys Civ. Action Dkt. No. 2]	N/A
603.018	Reply Memorandum of Law in Further Support of J&J's and JJCI's Motion to Fix Venue for Claims Related to Imery's	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	Bankruptcy [Imerys Civ. Action Dkt. No. 81] filed on May 28, 2019	
603.019	Memorandum of Law in Support of the Official Committee of Tort Claimants' and the Future Claimants' Representative's Motion for Temporary Restraining Order and Preliminary Injunction filed on July 28, 2021 in In re Imerys, Adv. Pro. No. 21-51006 [Imerys Adv. Pro. Dkt. No. 5]	N/A
603.020	Declaration of Mark A. Fink in Support of Motion for Temporary Restraining Order and Preliminary Injunction filed on July 28, 2021 [Imerys Adv. Pro. Dkt. No. 6]	N/A
603.021	Transcript of Hearing dated July 23, 2021 in Reyes v. Johnson & Johnson, et al.	N/A
603.022	Second Amended Complaint filed June 22, 2020 in Atlanta International Insurance v. Johnson & Johnson, MID-L-003563-19 (N.J. Super.)	N/A
603.023	Notice of Filing filed on September 21, 2021 [MDL Dkt. No. 25298]	N/A
603.024	Transcript of First Day Hearing held on October 20, 2021 in main bankruptcy case In re LTL Management LLC	N/A
603.025	Transcript of proceedings held on November 10, 2021 in this Adversary Proceeding.	N/A
604.001-604.021	Exhibits to Debtor's Reply (AP Dkt. 146)	N/A
604.001	Personal Products Co. Product Specification for Shower to Shower Deodorant Body Powder, dated April 11, 1980	JNJ 000058735

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
604.002	Personal Products Co. Request for Clinical Test of Shower to Shower, dated July 29, 1981	JNJ 000276279
604.003	Johnson & Johnson Major Executive Committee Actions, dated 1986	LTL 0019687
604.004	Johnson & Johnson and Johnson & Johnson Consumer Inc.'s verified Responses to Plaintiff's Supplemental Interrogatories and Document Requests in Harpster v. Brenntag N. Am. et al., No. MID-L-08173-19 (N.J. Super. Ct.), dated April 18, 2020	N/A
604.005	Excerpts from Dr. John Hopkins' sworn trial testimony on July 30, 2019 in Hayes v. Colgate-Palmolive Co., No. 16-CI-03503, in the Jefferson Circuit Court of Kentucky	N/A
604.006	Excerpts from Dr. Hopkins' sworn deposition testimony on October 1, 2019 in O'Hagan v. Johnson & Johnson in the Superior Court of California, County of Alameda	N/A
604.007	Excerpts from Dr. Hopkins' sworn deposition testimony on September 27, 2018 in Leavitt v. Johnson & Johnson in the Superior Court of California, County of Alameda	N/A
604.008	Excerpts from Dr. Susan Nicholson's sworn deposition testimony on September 22, 2020 in Monroe v. Johnson & Johnson, No. 2018RCSC01222, in the State Court of Richmond County, State of Georgia	N/A
604.009	Excerpts from Dr. Edwin Kuffner's sworn deposition testimony on October 30, 2021 in this proceeding	N/A

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
604.010	Minutes of the Annual Meeting of Directors of Windsor Minerals, Inc., dated April 25, 1979	WTALC00002221
604.011	Minutes of the Annual Meeting of Directors of Windsor Minerals, Inc., dated October 8, 1979	WTALC00002224
604.012	Letter from U.S. Dept. of Labor, Mine, Safety & Health Admin., to Windsor Minerals, Inc., dated September 21, 1983	WTALC00000381
604.013	Letter from U.S. Dept. of Labor, Mine, Safety & Health Admin., to Windsor Minerals, Inc., dated September 12, 1985	WTALC00000663
604.014	Letter from M. Palenik, Walter McCrone Assocs., Inc., to R. Miller, Windsor Minerals, Inc., dated June 4, 1984	JNJ 000347440
604.015	Letter from I. Stewart, McCrone Associates, Inc., to D. Benninger, Armstrong World Indus., Inc., dated May 21, 1987	JNJ 000314361
604.016	Windsor Minerals, Inc. Memorandum on 1982 Operational Strategy Plan for Hammondsville Mine, dated January 5, 1982	WTALC00008505
604.017	Johnson & Johnson Baby Products Co. Memorandum on Support to Baby Products Company Departments, dated October 31, 1980	JNJ000249909
604.018	Memorandum from James Utaski, Pres., Johnson & Johnson Baby Products Co., dated March 12, 1982	JNJTALC000466320
604.019	Johnson & Johnson Baby Products Co. Memorandum on Recommendation to Windsor Minerals for Improving the Prevention of Microbial	JNJ000870963

In re LTL Management LLC

Movants' Amended Preliminary Hearing Exhibit List

Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
	Contamination, dated September 3, 1985	
604.020	Johnson & Johnson Baby Products Co. Memorandum on Audit of Windsor Minerals, dated May 28, 1987	JNJ000885770
604.021	Unpublished opinion in Echevarria v. Johnson & Johnson et al., No. B286283, in the Court of Appeal of the State of California, Second Appellate District, dated July 9, 2019	N/A
605.001-605.003	Exhibits to TCC Sur-Reply (AP Dkt. 166)	N/A
605.001	Letter from R.J. Mortimer on behalf of Johnson & Johnson to Dr. D.R. Petterson regarding "Johns-Manville Talc Prospect," dated May 29, 1973	JNJTALC000668736
605.002	Excerpt of a document titled North American Asset Purchase Agreement among Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated September 9, 2012	LTL 0000972
605.003	Umbrella liability insurance policy numbered JU 0802 for the policy period of January 1, 1980 through January 1, 1983 issued by The North River Insurance Company to Johnson & Johnson, dated May 22, 1980	LTL 0000410
606.001	Kuffner Deposition Transcript	N/A
606.002	Mullin Deposition Transcript	N/A
JOHNSON & JOHNSON SEC FILINGS		
607	Johnson & Johnson Form 10-K-Annual Report for FY 2017	N/A
608	Johnson & Johnson Form 10-K-Annual Report for FY 2018	N/A

In re LTL Management LLC

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
609	Johnson & Johnson Form 10-K-Annual Report for FY 2019	N/A
610	Johnson & Johnson Form 10-K-Annual Report for FY 2020	N/A
611	Johnson & Johnson Form 10-Q - Quarterly Report for Q1 2017	N/A
612	Johnson & Johnson Form 10-Q - Quarterly Report for Q2 2017	N/A
613	Johnson & Johnson Form 10-Q - Quarterly Report for Q3 2017	N/A
614	Johnson & Johnson Form 10-Q - Quarterly Report for Q1 2018	N/A
615	Johnson & Johnson Form 10-Q - Quarterly Report for Q2 2018	N/A
616	Johnson & Johnson Form 10-Q - Quarterly Report for Q3 2018	N/A
617	Johnson & Johnson Form 10-Q - Quarterly Report for Q1 2019	N/A
618	Johnson & Johnson Form 10-Q - Quarterly Report for Q2 2019	N/A
619	Johnson & Johnson Form 10-Q - Quarterly Report for Q3 2019	N/A
620	Johnson & Johnson Form 10-Q - Quarterly Report for Q1 2020	N/A
621	Johnson & Johnson Form 10-Q - Quarterly Report for Q2 2020	N/A
622	Johnson & Johnson Form 10-Q - Quarterly Report for Q3 2020	N/A
623	Johnson & Johnson Form 10-Q - Quarterly Report for Q1 2021	N/A
624	Q1 2017 Johnson & Johnson Earnings Presentation 4/18/2017	N/A
625	Q2 2017 Johnson & Johnson Earnings Presentation 7/18/2017	N/A
626	Q3 2017 Johnson & Johnson Earnings Presentation 10/17/2017	N/A
627	Full Year 2017 Results Johnson & Johnson Presentation 1/23/2018	N/A
628	Q1 2018 Johnson & Johnson Earnings Presentation 4/17/2018	N/A
629	Q2 2018 Johnson & Johnson Earnings Presentation 7/17/2018	N/A

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Exhibit	Document Description	Bates Number
630	Q3 2018 Johnson & Johnson Earnings Presentation 10/16/2018	N/A
631	Full Year 2018 Results Johnson & Johnson Presentation 1/22/2019	N/A
632	Q1 2019 Johnson & Johnson Earnings Presentation 4/16/2019	N/A
633	Q2 2019 Johnson & Johnson Earnings Presentation 7/16/2019	N/A
634	Q3 2019 Johnson & Johnson Earnings Presentation 10/15/2019	N/A
635	Full Year 2019 Results Johnson & Johnson Presentation 1/22/2020	N/A
636	Q1 2020 Johnson & Johnson Earnings Presentation 1/14/2020	N/A
637	Q2 2020 Johnson & Johnson Earnings Presentation 7/16/2020	N/A
638	Q3 2020 Johnson & Johnson Earnings Presentation 10/13/2020	N/A
639	Full Year 2020 Results Johnson & Johnson Presentation 1/26/2021	N/A
640	Q1 2021 Johnson & Johnson Earnings Presentation 4/20/2021	N/A
641	Q2 2021 Johnson & Johnson Earnings Presentation 7/21/2021	N/A
642	Q3 2021 Johnson & Johnson Earnings Presentation 10/19/2021	N/A
643	Full Year 2021 Results Johnson & Johnson Presentation 1/25/2022	N/A
644	Johnson & Johnson NYSE: JNJ FQ4 2016 Earnings Call Transcripts	N/A
645	Johnson & Johnson NYSE: JNJ FQ1 2017 Earnings Call Transcripts	N/A
646	Johnson & Johnson NYSE: JNJ FQ2 2017 Earnings Call Transcripts	N/A
647	Johnson & Johnson NYSE: JNJ FQ3 2017 Earnings Call Transcripts	N/A

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
648	Johnson & Johnson NYSE: JNJ FQ4 2017 Earnings Call Transcripts	N/A
649	Johnson & Johnson NYSE: JNJ FQ1 2018 Earnings Call Transcripts	N/A
650	Johnson & Johnson NYSE: JNJ FQ2 2018 Earnings Call Transcripts	N/A
651	Johnson & Johnson NYSE: JNJ FQ3 2018 Earnings Call Transcripts	N/A
652	Johnson & Johnson NYSE: JNJ FQ4 2018 Earnings Call Transcripts	N/A
653	Johnson & Johnson NYSE: JNJ FQ1 2019 Earnings Call Transcripts	N/A
654	Johnson & Johnson NYSE: JNJ FQ2 2019 Earnings Call Transcripts	N/A
655	Johnson & Johnson NYSE: JNJ FQ3 2019 Earnings Call Transcripts	N/A
656	Johnson & Johnson NYSE: JNJ FQ4 2019 Earnings Call Transcripts	N/A
657	Johnson & Johnson NYSE: JNJ FQ1 2020 Earnings Call Transcripts	N/A
658	Johnson & Johnson NYSE: JNJ FQ2 2020 Earnings Call Transcripts	N/A
659	Johnson & Johnson NYSE: JNJ FQ3 2020 Earnings Call Transcripts	N/A
660	Johnson & Johnson NYSE: JNJ FQ4 2020 Earnings Call Transcripts	N/A
661	Johnson & Johnson NYSE: JNJ FQ1 2021 Earnings Call Transcripts	N/A

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Preliminary Hearing Exhibit List		
Exhibit	Document Description	Bates Number
662	Johnson & Johnson NYSE: JNJ FQ2 2021 Earnings Call Transcripts	N/A
663	Johnson & Johnson NYSE: JNJ FQ3 2021 Earnings Call Transcripts	N/A
664-703	Intentionally Omitted	Intentionally Omitted
SPGI DOCUMENTS		
704	7/19/2021 Meeting Invite re JNJ/S&P Ratings - discuss media reports about cordoning off talc liabilities	SPGI0000006 0001
705	10/18/2021 Email re JNJ - LTL Bankruptcy	SPGI0000049_0001- SPGI0000049 0003
706	8/26/2021 Meeting Invite re JNJ - Internal Conversation - Litigation & cordoning off of Talc liabilities	SPGI0000053 0001
707	8/26/2021 Email attaching "Talc: the next wave of asbestos litigation?"	SPGI0000080_0001-0005; SPGI0000081 0001-0002
708	11/12/2019 re request for talc cases and Talc Trial Results	SPGI0000191_0001-0003; SPGI0000192 0001-0004
709	10/13/2021 Email re Quick Update	SPGI0000761_0001- SPGI0000761 0002
710	7/19/2021 Email re S&P Ratings	SPGI0000490_0001- SPGI0000490 0002
711	6/2/2021 Email re S&P	SPGI0000507_0001- SPGI0000507 0005
712	10/13/2021 Meeting Invite re Update Call with JNJ/S&P	SPGI0000690 0001
713	10/14/2021 Email re JNJ Discussion	SPGI0000692 0001
714	10/14/2021 Meeting Invite re Update Call with JNJ/S&P	SPGI0000705 0001
715	10/14/2021 Meeting Invite re Talc Discussion	SPGI0000708 0001
716	10/28/2021 Email re Courtesy Copy of ESG Credit Indicator Report Card Paragraph	SPGI0000784 0001

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Exhibit	Document Description	Bates Number
717	10/27/2020 S&P Global Ratings Periodic Review of Johnson & Johnson	SPGI0000868_0001- SPGI0000868_0031
718	6/2/2021 Email re S&P Ratings	SPGI0000901_0001- SPGI0000901_0006
719	10/14/2021 JNJ Internal Notes re filing bankruptcy for subsidiary with all talc liabilities	SPGI0000903_0001
720	8/27/2021 JNJ Internal Conversation re documenting situational adjustment for litigation adjustment	SPGI0000904_0001- SPGI0000904_0004
721	1/7/2022 S&P Global Ratings Periodic Review of Johnson & Johnson	SPGI0000950_0001- SPGI0000950_0041
722	10/13/2020 JNJ Internal Conversation	SPGI0001078_0001- SPGI0001078_0002
723	10/14/2021 Discussion on JNJ	SPGI0001110_0001- SPGI0001110_0003
724	Johnson & Johnson - Committee 11-2021	SPGI0001115_0001- SPGI0001115_0004
725	11/4/2021 S&P Global Ratings Committee Package re Johnson & Johnson	SPGI0001124_0001- SPGI0001124_0066
726	Johnson & Johnson 'AAA' Ratings Affirmed On Divestiture Announcement; Outlook Remains Negative	SPGI0001145_0001 SPGI0001145_0008
727	8/27/2021 Email re JNJ - Internal conversation on Litigation	SPGI0000350_0001
728	Excel Spreadsheet re S&P Global Ratings for Johnson & Johnson	SPGI0001111_0001
729	10/14/2021 Meeting Invite re Discussion: JNJ	SPGI0000710_0001
730	Email Re: JNJ Defense Cost	SPGI0000580_0001
731	Email Re: JNJ Litigation Liability	SPGI0000043_0001
732	Email Re: J&J Must Pay \$2.1B Talc Award as Top Court Rejects Appeal	SPGI0000471_0001

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Exhibit	Document Description	Bates Number
733	Email Re: JNJ – updated arrow metrics improved (with Q2-2020 rolling off)	SPGI0000520_0001
734	J&J – Internal Conversation (8.27.2021)	SPGI0001112_0001
735	S&P Global Rating Bulletin: J&J Settlement Plan Is a Positive Development for Credit Quality	SPGI0000716_0001
736	Email Re: legal details	SPGI0000632_0001
737	J&J MM 11-12-20	SPGI0000863_0001
738	Email Re: S&P Ratings – request for an update on legal reserves & settlement expectations	SPGI0000111_0001
739	Email Re: S&P Ratings – Request for more context around reports of lawyers indicating possibility of putting talc liabilities into bankruptcy	SPGI0000419_0001
740	Meeting Acceptance re: JNJ/S&P Ratings – discuss media reports about cordoning off talc liabilities	SPGI0000263_0001
741	Email Re: SPGConfidential – JNJ Bulletin	SPGI0000756_0001
742	Email Re: JNJ – LTL Bankruptcy	SPGI0000758_0001
743	Email Re: JNJ – LTL Bankruptcy	SPGI0000759_0001
744	Meeting Acceptance re: Update Call with JNJ/S&P	SPGI0000769_0001
745	Email Re: JNJ – LTL Bankruptcy	SPGI0000776_0001